

WASHOE COUNTY HEALTH DISTRICT

ENHANCING QUALITY OF LIFE

The Washoe County Portion of the
Nevada State Implementation Plan to
Meet the Ozone Infrastructure SIP
Requirements of Clean Air Act Section
110(a)(2)

Adopted by the Washoe County District Board of
Health on July 26, 2018



Public Health
Prevent. Promote. Protect.

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Acronyms and Abbreviations

| | |
|-------------------|--|
| AQMD | Washoe County Health District, Air Quality Management Division |
| AQS | Air Quality System |
| CAA | Clean Air Act |
| CFR | Code of Federal Regulations |
| CO | Carbon Monoxide |
| DMV | Nevada Department of Motor Vehicles |
| EPA | U.S. Environmental Protection Agency |
| FR | Federal Register |
| HA | Hydrographic Area |
| I-SIP | Infrastructure State Implementation Plan |
| NAAQS | National Ambient Air Quality Standard |
| NDEP | Nevada Division of Environmental Protection |
| NO ₂ | Nitrogen Dioxide |
| NRS | Nevada Revised Statute |
| NSR | New Source Review |
| O ₃ | Ozone |
| Pb | Lead |
| PM _{2.5} | Particulate Matter less than or equal to a nominal 2.5 microns in aerodynamic diameter |
| PM ₁₀ | Particulate Matter less than or equal to a nominal 10 microns in aerodynamic diameter |
| PSD | Prevention of Significant Deterioration |
| SIP | State Implementation Plan |
| SLAMS | State and Local Air Monitoring Station |
| SO ₂ | Sulfur Dioxide |
| USC | United States Code |
| WCDBOH | Washoe County District Board of Health |

Acknowledgments

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Introduction and Background

Sections 110(a)(1) and (2) of the federal Clean Air Act (CAA), 42 USC § 7410(a)(1) and (2) hereafter referred to as the “Infrastructure” State Implementation Plan (I-SIP) requirements, requires states and delegated local agencies to submit an implementation plan to the U.S. Environmental Protection Agency (EPA) demonstrating their ability and authority to implement, maintain, and enforce each National Ambient Air Quality Standard (NAAQS). Section 110(a)(1) addresses the timing requirement for the submissions of the I-SIP. Washoe County is required to submit an I-SIP to EPA not later than three years after promulgation of a new or revised NAAQS regardless of whether or not the local jurisdiction has any nonattainment areas.

Section 110(a)(2) lists the required elements that cover the I-SIP. These elements include: enforceable emission limitations, air quality modeling, enforcement programs, ambient air monitoring programs, and confirmation of adequate personnel, resources and legal authorities. The following elements are addressed in this I-SIP:

- Enforceable Emission Limitations and Other Control Measures (Element A)
- Air Quality Monitoring, Compilation, Data Analysis, and Reporting (Element B)
- Enforcement and Stationary Source Permitting (Element C)
- Interstate Transport (Element D)
- Resources, Conflict of Interest, and Emergency Backstop (Element E)
- Stationary Source Emissions Monitoring and Reporting (Element F)
- Emergency Powers and Contingency Plans (Element G)
- SIP Revision For Revised Air Quality Standards or New Attainment Methods (Element H)
- SIP Revisions for New Nonattainment Areas (Element I)
- Consultation and Public Notification (Element J)
- Air Quality Modeling and Reporting (Element K)
- Major Stationary Source Permitting Fees (Element L)
- Consultation with Local Entities (Element M)

This I-SIP addresses Washoe County’s portion of the State of Nevada’s requirements for the 2015 Ozone NAAQS.

Table 1
Existing SIP Elements Meeting Current CAA 110(a)(2)(A)-(M) Requirements for
the Washoe County Portion of the Nevada Infrastructure SIP for the
2015 Ozone NAAQS, Unless Otherwise Noted

| Element (A) | <u>Enforceable emission limits and other control measures:</u> Requires SIPs to include enforceable emission limits and other control measures, means, or techniques, and schedules for compliance. |
|----------------|--|
| | <p>WCDBOH Regulations Governing Air Quality Management (Regulation) Section 020.005 (See 38 FR 12702) authorizes the Control Officer to enforce all SIP measures including the following previously submitted Sections:</p> <p>030.000; 030.005; 030.010; 030.015; 030.025; 030.030; 030.110; 030.115(1), (5), and Subsection B; 030.1201;030.205; 030.215; 030.245; 030.250 (See 46 FR 21758); 030.300; 030.305; 030.310; 030.3101-3105; 030.3107; 030.3108 (See 46 FR 43141); 030.218, 030.230, and 030.970A (See 77 FR 60915); 040.070; 040.075; 040.080; 040.085; 040.090 (See 46 FR 21758); and 050.001 (See 72 FR 33397).</p> <p>The following Sections have not been submitted as part of the SIP, but have been adopted by the WCDBOH and further support this element requirement (See Attachment B):</p> <p>020.0051 (Board of Health - Powers and Duties); and 020.020 (Control Officer - Powers and Duties).</p> |
| Element (B) | <u>Ambient air quality monitoring/data system:</u> Requires SIPs to provide for establishment and operation of ambient air quality monitors, collection and analysis of ambient air quality data, and to make these data available to EPA upon request. |
| | <p>The AQMD operates an ambient air monitoring network in accordance with 40 CFR 58. The network is reviewed annually pursuant to 40 CFR 58.10 to ensure it meets ambient air monitoring objectives (See Attachment A).</p> |

| Element (C) | <u>Program for enforcement of control measures:</u> Requires SIPs to include a program providing for enforcement of all SIP measures and the regulation of construction of new and modified stationary sources as necessary to assure that the NAAQS are achieved, including a permit program as required in Parts C and D. |
|----------------|---|
| | <p>WCDBOH Regulation Section 020.005 (See 38 FR 12702) authorizes the Control Officer to enforce all SIP measures including the following previously submitted Sections:</p> <p>030.000; 030.005; 030.010; 030.015; 030.025; 030.030; 030.110; 030.115(1), (5), and Subsection B; 030.1201;030.205; 030.215; 030.245; 030.250 (See 46 FR 21758); 030.300; 030.305; 030.310; 030.3101-3105; 030.3107; 030.3108 (See 46 FR 43141); 030.218, 030.230, and 030.970A (See 77 FR 60915); 040.070; 040.075; 040.080; 040.085; 040.090 (See 46 FR 21758); and 050.001 (See 72 FR 33397).</p> <p>The following Sections have not been submitted as part of the SIP, but have been adopted by the WCDBOH and further support this element requirement (See Attachment B):</p> <p>010.1303 (Regulated Air Pollutant); 020.0051 (Board of Health - Powers and Duties); 020.020 (Control Officer - Powers and Duties); 030.002 (Construction or Modification of Permitted Operations); 030.500 (New Source Review (NSR) Applicability); 030.502 (Review for Emission Limitation Compliance); 030.503 (Conditions for Approval); 030.504 (Emission Offset Ratios); 030.505 (Completeness of Application); 030.506 (Requirements for Public Notice); 030.507 (Comments); 030.508 (Final Action); and 030.905 (Sources Requiring Part 70 Permits).</p> <p>On March 13, 2008, the AQMD received full delegation of the federal PSD program (See Washoe County 2006 PM_{2.5} NAAQS I-SIP, Attachment C, submitted December 4, 2009) and is incorporated into Nevada's SIP (40 CFR 52.1485).</p> |

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| Element (D) | <u>Interstate transport provisions:</u> Requires SIPs to contain adequate provisions prohibiting emissions generated within the state from contributing significantly to nonattainment in, or interfering with maintenance by, any other state with respect to the NAAQS, or from interfering with measures required to be included in the SIP of any other state to prevent significant deterioration or to protect visibility. |
| | <p><u>(D)(i)</u> Emissions activities from within Nevada do not contribute significantly to nonattainment in, or interfere with maintenance by, any other state with respect to the 2015 ozone NAAQS. Based on recently released EPA contribution modeling, Nevada's expected contribution of 2023 anthropogenic nitrogen oxides (NOx) and volatile organic compound (VOC) emissions from the State do not contribute greater than one percent of the 2015 ozone NAAQS to any EPA-identified nonattainment or maintenance receptor in any other state. Nevada commits to continue to review new air quality information as it becomes available to ensure that this negative declaration is still supported by such information. The analysis is included in Attachment C.</p> <p><u>(D)(ii) CAA section 126</u> The following WCDBOH Regulations address the CAA section 126(a) requirements regarding notification to affected nearby states of major proposed new or modified sources. [see also elements (J) and (M)]: 030.000; 030.005; 030.010; 030.015; 030.025; 030.030; 030.110; 030.115(1), (5), and Subsection B; 030.1201;030.205; 030.215; 030.245; 030.250 (See 46 FR 21758); 030.300; 030.305; 030.310; 030.3101-3105; 030.3107; 030.3108 (See 46 FR 43141); 030.218, 030.230, and 030.970A (See 77 FR 60915); 040.070; 040.075; 040.080; 040.085; 040.090 (See 46 FR 21758); and 050.001 (See 72 FR 33397).</p> <p>The following Sections have not been submitted as part of the SIP, but have been adopted by the WCDBOH and further support this element requirement (See Attachment B): 010.1303 (Regulated Air Pollutant); 020.0051 (Board of Health - Powers and Duties); 020.020 (Control Officer - Powers and Duties); 030.002 (Construction or Modification of Permitted Operations); 030.500 (New Source Review (NSR) Applicability); 030.502 (Review for Emission Limitation Compliance); 030.503 (Conditions for Approval); 030.504 (Emission Offset Ratios);</p> |

030.505 (Completeness of Application);
 030.506 (Requirements for Public Notice);
 030.507 (Comments);
 030.508 (Final Action); and
 030.905 (Sources Requiring Part 70 Permits).

On March 13, 2008, the AQMD received full delegation of the federal PSD program (See Washoe County 2006 PM_{2.5} NAAQS I-SIP, Attachment C, submitted December 4, 2009) and is incorporated into Nevada's SIP (40 CFR 52.1485).

The requirements of section 126 (b) and (c) do not apply, because no source or sources within the state are the subject of an active finding under section 126 of the CAA with respect to the particular NAAQS at issue.

(D)(ii) CAA section 115

The requirements of section 115 do not apply, because there are no final findings under section 115 of the CAA against this state with respect to the particular NAAQS at issue.

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| Element (E) | <u>Adequate resources:</u> Requires SIPs to provide necessary assurances for adequate personnel, funding, and authority under state law to carry out its SIP, to contain requirements addressing potential conflicts of interest, and to provide necessary assurances that the state retains responsibility for ensuring adequate implementation of the SIP where the state relies on a local or regional government for implementation of any SIP provision. |
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NRS 445B.500 authorizes the WCDBOH to implement and administer air quality management programs within the geographic boundaries of Washoe County. These programs are managed through the AQMD. For the most recent fiscal year (2018-19), the AQMD consisted of 19.4 allocated full-time equivalents. Primary funding sources are: 1) Operating permit fees; 2) EPA grants; 3) Nevada DMV funds; and 4) the City of Reno, City of Sparks, and County of Washoe via an inter-local agreement with the Washoe County Health District (See Washoe County 2006 PM_{2.5} NAAQS I-SIP, Attachment D, submitted December 4, 2009).

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| Element (F) | <u>Stationary source monitoring system</u> : Requires SIPs to establish a system to monitor emissions from stationary sources, to submit periodic emissions reports, to correlate the emissions reports with the corresponding SIP emission limits and standards, and to make emissions reports available to the public. |
| <p>WCDBOH Regulation Section 020.005 (See 38 FR 12702) authorizes the Control Officer to enforce all SIP measures including the following previously submitted Sections related to authority for stationary source monitoring and reporting:</p> <p>030.210; 030.250 (See 46 FR 21758); and 030.218, 030.230; 030.235, and 030.970A (See 77 FR 60915).</p> <p>The following Sections have not been submitted as part of the SIP, but have been adopted by the WCDBOH and further support this element requirement (See Attachment B):</p> <p>020.0051 (Board of Health - Powers and Duties); and 020.060 (Sampling and Testing).</p> | |
| Element (G) | <u>Emergency episodes</u> : Requires SIPs to provide for authority to address activities causing imminent and substantial endangerment to public health and to provide for adequate contingency plans to implement such authority. |
| <p>Emergency powers are authorized under WCDBOH Regulation 050.001 (Emergency Episode Plan) (See 72 FR 33397). In addition, general emergency powers are provided in Nevada's SIP in NRS 445B.560.</p> | |
| Element (H) | <u>Future SIP revisions</u> : Requires SIPs to provide for SIP revisions in response to changes in the NAAQS, or availability of improved methods for attaining the NAAQS, and in response to an EPA finding that the SIP is substantially inadequate. |
| <p>WCDBOH Regulation Section 020.005 (See 38 FR 12702) authorizes the Control Officer to enforce Section 020.0051 (Board of Health - Powers and Duties) which provides the WCDBOH the authority to revise a SIP "to achieve and maintain levels of air quality to protect human health".</p> | |

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| Element (I) | <u>SIP revisions for new non-attainment areas</u> : Requires SIP revisions to meet the applicable Part D requirements relating to non-attainment areas. |
| The AQMD commits to submit SIP revisions whenever the county, or portions of the county, are newly designated non-attainment for any federal NAAQS. | |
| Element (J) [§121] | <u>Consultation with government officials, public notification, PSD and visibility protection</u> : Requires states to provide a process for consultation with local governments and Federal Land Managers carrying out NAAQS implementation requirements; . . . |
| All SIP elements are adopted by the WCDBOH before being formally submitted as the Washoe County portion of the Nevada SIP. Participation by local political subdivisions is authorized by WCDBOH Regulation Section 020.005 (See 38 FR 12702) and an inter-local agreement between the City of Reno, City of Sparks, and the County of Washoe, Nevada (See Washoe County 2006 PM _{2.5} NAAQS I-SIP, Attachment D, submitted December 4, 2009). This inter-local agreement requires that the WCDBOH include one elected official from each of the three political subdivisions in Washoe County. The AQMD is committed to include all stakeholders, such as local governments and federal land managers, in the SIP development process. | |
| Element (J) [§127] | . . . requires SIPs to notify the public if NAAQS are exceeded in an area and to enhance public awareness of measures that can be taken to prevent exceedances; and . . . |
| WCDBOH Regulation Section 050.001 (See 72 FR 33397) authorizes the AQMD to advise the public on measures that are taken to reduce their exposure during elevated air pollutant concentrations. Near-time ambient air monitoring data are posted on the AQMD website (OurCleanAir.com) and are also available at AirNow (AirNow.gov). An Air Quality Trends report, which summarizes monitored ambient air quality in Washoe County, is prepared annually and posted on the AQMD website. | |
| Element (J) [Part C PSD / Visibility] | . . . requires SIPs to meet applicable requirements of Part C related to prevention of significant deterioration and visibility protection. |
| On July 31, 2007, EPA's approval of Nevada's interstate transport SIP (CAA 110(a)(2)(D)(i)) for the 8-hour O ₃ and PM _{2.5} NAAQS promulgated in July 1997 was published in the Federal Register (See 72 FR 41629). Also, Article 13 of Nevada's SIP, "General Provisions for the Review of New Sources," requires an environmental evaluation before a registration certificate may be issued. | |

| | |
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| <p>Finally, on March 13, 2008, the AQMD received full delegation of the federal PSD program (See Washoe County 2006 PM_{2.5} NAAQS I-SIP, Attachment C, submitted December 4, 2009) and is incorporated into Nevada's SIP (40 CFR 52.1485).</p> | |
| <p>Element (K)</p> | <p><u>Air quality modeling/data</u>: Requires SIPs to provide for the performance of air quality modeling for predicting effects on air quality of emissions of any NAAQS pollutant and the submission of such data to EPA upon request.</p> |
| <p>WCDBOH Regulation Section 030.235 (Requirements for Source Sampling and Testing) (See 77 FR 60915) authorizes the Control Officer to require operators to provide source stack testing or other types of testing to determine the quantity and effect of emissions produced by a stationary source.</p> <p>In addition, the following Section has not been submitted as part of the SIP, but has been adopted by the WCDBOH and further support this element requirement (See Attachment B):</p> <p>030.503 (Conditions for Approval).</p> | |
| <p>Element (L)</p> | <p><u>Permitting fees</u>: Requires SIPs to require each major stationary source to pay permitting fees to cover the cost of reviewing, acting upon, implementing and enforcing a permit until such fee requirement is superseded by EPA approval of a fee program under Title V of the CAA.</p> |
| <p>Permitting fees are authorized under WCDBOH Regulation Sections 030.210 (See 46 FR 21758) and 030.310 (See 46 FR 43141).</p> | |
| <p>Element (M)</p> | <p><u>Consultation/participation by affected local entities</u>: Requires SIPs to provide for consultation and participation in SIP development by local political subdivisions affected by the SIP.</p> |
| <p>All SIP elements are adopted in a public hearing by the WCDBOH before being formally submitted as the Washoe County portion of the Nevada SIP. Participation by local political subdivisions is authorized by WCDBOH Regulation Section 020.005 (See 38 FR 12702) and an inter-local agreement between the City of Reno, City of Sparks, and the County of Washoe, Nevada (See Washoe County 2006 PM_{2.5} NAAQS I-SIP, Attachment D, submitted December 4, 2009). This inter-local agreement requires that the WCDBOH include one elected official from each of the three political subdivisions in Washoe County.</p> | |

Attachment A

Letter from Gwen Yoshimura (EPA Region 9) to Daniel Inouye (AQMD) Regarding
the “2017 Annual Monitoring Network Plan” (October 30, 2017)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street

San Francisco, CA 94105-3901

OCT 30 2017

Mr. Daniel K. Inouye
Chief, Monitoring and Planning Branch
Air Quality Management Division
Washoe County Health District
P.O. Box 11130
Reno, Nevada 89520-0027

Dear Mr. Inouye:

Thank you for your submission of the Washoe County Health District Air Quality Management Division's (AQMD's) *2017 Ambient Air Monitoring Network Plan* on June 30, 2017. We have reviewed the submitted document based on the requirements set forth under 40 CFR 58. Based on the information provided in the plan, the U.S. Environmental Protection Agency (EPA) approves all portions of the network plan except those specifically identified below.

Please note that we cannot approve portions of the annual network plan for which the information in the plan is insufficient to judge whether the requirement has been met, or for which the information, as described, does not meet the requirements as specified in 40 CFR 58.10 and the associated appendices. EPA Region 9 also cannot approve portions of the plan for which the EPA Administrator has not delegated approval authority to the regional offices. Accordingly, the first enclosure (*A. Annual Monitoring Network Plan Items where EPA is Not Taking Action*) provides a listing of specific items of your agency's annual monitoring network plan where EPA is not taking action. The second enclosure (*B. Additional Items Requiring Attention*) is a listing of additional items in the plan that EPA wishes to bring to your agency's attention.

The third enclosure (*C. Annual Monitoring Network Plan Checklist*) is the checklist EPA used to review your plan for overall items that are required to be included in the annual network plan along with our assessment of whether the plan submitted by your agency addresses those requirements.

The first two enclosures highlight a subset of the more extensive list of items reviewed in the third enclosure. All comments conveyed via this letter (and enclosures) should be addressed (through corrections within the plan, additional information being included, or discussion) in next year's annual monitoring network plan.

If you have any questions regarding this letter or the enclosed comments, please feel free to contact me at (415) 947-4134 or Anna Mebust at (415) 972-3265.

Sincerely,

A handwritten signature in blue ink, appearing to read "Gwen Yoshimura", with a long horizontal flourish extending to the right.

Gwen Yoshimura, Manager
Air Quality Analysis Office

Enclosures:

- A. Annual Monitoring Network Plan Items where EPA is Not Taking Action
- B. Additional Items Requiring Attention
- C. Annual Monitoring Network Plan Checklist

cc (via email): Craig Petersen, AQMD

A. Annual Monitoring Network Plan Items where EPA is Not Taking Action

We are not acting on the portions of annual network plans where either EPA Region 9 lacks the authority to approve specific items of the plan, or EPA has determined that a requirement is either not met or information in the plan is insufficient to judge whether the requirement has been met.

- System modifications (e.g., site closures or moves) are subject to approval per 40 CFR 58.14(c). Information provided in the plan was insufficient for EPA to approve the system modifications listed in the plan per the applicable requirement. Therefore, we are not acting on the following items as part of this year's annual network plan (see Checklist Row 4):
 - Shutdown of Plumb Kit SLAMS (PM₁₀ and meteorology)
 - Discontinuation of PM₁₀ SLAMS monitoring at South Reno
 - Initiation of a new monitoring site at West Reno/Verdi
- EPA identified items in your agency's annual monitoring network plan where a requirement was not being met or information in the plan was insufficient to judge whether the requirement was being met based on 40 CFR 58.10 and the associated appendices. Therefore, we are not acting on the following items:

| Item | Checklist Row | Issue |
|--|---------------|---|
| PM ₁₀ collocation | 30 | Insufficient to judge |
| Traffic count of nearest road | 74 | Insufficient to judge in some instances |
| Statement of whether the operation of each monitor meets Appendices requirements | 3 | Insufficient to judge |
| POC for each monitor | 65 | Incorrect in one instance |

Additional information for each of these items may be found for the row listed in column 2, in the third enclosure (*C. Annual Monitoring Network Plan Checklist*).

B. Additional Items Requiring Attention

- [Item 7] The detailed site table entry for “Proposed modifications within the next 18 months?” for South Reno PM₁₀ is “None.” AQMD discusses a planned request to terminate this monitor on Page 10, and EPA is currently reviewing a formal request for this termination as submitted by AQMD. Please update this table entry to reflect this proposed change in next year’s plan.
- [Item 10] Please note that no statement was provided for the Spanish Springs SPMs. Since these monitors did not begin operation until 2017, AQMD is meeting the requirement for this network plan, however, please address this checklist item for the Spanish Springs SPMs in next year’s plan. Note that if checklist item #3 is addressed, that may meet the requirement for this checklist item as well.
- [Item 17] While AQMD is meeting the requirement, note that the count of the total number of sites includes the SPM operating at Spanish Springs. This monitor is an SPM that has been operating for fewer than 24 months, and did not begin monitoring until 2017. This monitor therefore should not be counted towards meeting minimum monitoring requirements in this plan or next year’s plan. The intent is to convert this monitor to a SLAMS monitor after 18 months of operation, which EPA has approved; once converted to a SLAMS monitor, it is eligible to be counted towards minimum monitoring requirements.

Also, please note that based on 2016 design values, the number of required sites for PM_{2.5} is 0, not 1 as given in the table. Please update this as needed in next year’s plan, based on updated design values.

- [Item 18] While meeting the requirement, please note that based on 2016 design values, the number of required continuous PM_{2.5} monitors is 0, not 1 as given in the table. Please update this as needed in next year’s plan, based on updated design values.
- [Item 29] While AQMD is meeting the requirement, note that the count of the total number of sites includes the SPM operating at Spanish Springs. This monitor is an SPM that has been operating for fewer than 24 months, and did not begin monitoring until 2017. This monitor therefore should not be counted towards meeting minimum monitoring requirements in this plan or next year’s plan. The intent is to convert this monitor to a SLAMS monitor after 18 months of operation, which EPA has approved; once converted to a SLAMS monitor, it is eligible to be counted towards minimum monitoring requirements.

Also, please note that the maximum concentration provided in Table 5 should be the maximum observed over the last 3 years, not the maximum observed in 2016. Based on the maximum concentration observed over the last 3 years, the number of required sites for PM₁₀ should be 1-2, not 0-1 as given in the table. Please update this as needed in next year’s plan based on updated concentrations.

- [Item 44] While AQMD is meeting the requirement, note that the count of the total number of sites includes the SPM operating at Spanish Springs. This monitor is an SPM that has been operating for fewer than 24 months, and did not begin monitoring until 2017. This monitor therefore should not be counted towards meeting minimum monitoring requirements in this plan or next year's plan. The intent is to convert this monitor to a SLAMS monitor after 18 months of operation, which EPA has approved; once converted to a SLAMS monitor, it is eligible to be counted towards minimum monitoring requirements.
- [Item 66] NAAQS Comparison should not be the monitoring objective for NO and NO_x monitors at Reno3, or for PM_{10-2.5} at Spanish Springs and Sparks. Please update this in next year's plan.
- [Item 69] While meeting the requirement, for Toll, the plan states that "Due to the distance from the probe to the nearest roadway, this is a middle scale site for CO." Based on the distance to road and traffic count provided, this site would be characterized as neighborhood scale for CO. AQMD may choose to continue to characterize it as middle scale if it is impacted by other CO sources, but if not, AQMD may want to consider changing the scale provided for this monitor.
- [Item 73] While meeting the requirement, please provide the traffic count for and distance to nearby local roads for the Spanish Springs SPM site. These roads are closer than the road for which the traffic count was provided.

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C. ANNUAL MONITORING NETWORK PLAN CHECKLIST

(Updated February 9, 2017)

Year: 2017

Agency: Washoe County Health District – Air Quality Management Division (AQMD)

40 CFR 58.10(a)(1) requires that each Annual Network Plan (ANP) shall provide for the documentation of the establishment and maintenance of an air quality surveillance system that consists of a network of SLAMS monitoring stations that can include FRM, FEM, and ARM monitors that are part of SLAMS, NCore, CSN, PAMS, and SPM stations.

40 CFR 58.10(a)(1) further directs that, “The plan shall include a statement of whether the operation of each monitor meets the requirements of appendices A, B, C, D, and E of this part, where applicable. The Regional Administrator may require additional information in support of this statement.” On this basis, review of the ANPs is based on the requirements listed in 58.10 along with those in Appendices A, C, D, and E.

EPA Region 9 will not take action to approve or disapprove any item for which Part 58 grants approval authority to the Administrator rather than the Regional Administrators, but we will do a check to see if the required information is included and correct. The items requiring approval by the Administrator are: PAMS, NCore, and Speciation (STN/CSN).

Please note that this checklist summarizes many of the requirements of 40 CFR Part 58, but does not substitute for those requirements, nor do its contents provide a binding determination of compliance with those requirements. The checklist is subject to revision in the future and we welcome comments on its contents and structure.

Key:

| | |
|--------|--|
| White | meets the requirement |
| Yellow | requirement is not met, or information is insufficient to make a determination. Action requested in next year’s plan or outside the ANP process (items listed in Enclosure A). |
| Green | item requires attention in order to improve next year’s plan (items listed in Enclosure B). |

| | ANP requirement | Citation within 40 CFR 58 ¹ | Was the information submitted? ² If yes, page #s. | Does the information provided ³ meet the requirement? ⁴ | Notes |
|----------------------------------|---|---|--|---|---|
| GENERAL PLAN REQUIREMENTS | | | | | |
| 1. | Submit plan by July 1 st | 58.10 (a)(1) | Yes, cover letter | Yes | Plan was submitted June 30, 2017. |
| 2. | 30-day public comment / inspection period | 58.10 (a)(1); 58.10 (c) | Yes, cover letter | Yes | No comments were received. |
| 3. | Statement of whether the operation of each monitor meets the requirements of appendices A, B, C, D, and E, where applicable | 58.10 (a)(1) | No | Insufficient to judge | No statement was provided to meet this requirement. This checklist item is newly required as part of the 2016 Monitoring Rule Revisions. In future plans, please address this requirement. If the plan already discusses all deviations of the monitors from requirements in the 40 CFR 58 Appendices, the addition of the following sentence is sufficient: "Except where otherwise noted, each monitor meets the requirements of appendices A, B, C, D, and E, where applicable." |
| 4. | Modifications to SLAMS network – case when we are not approving system modifications | 58.10 (a)(2); 58.10 (b)(5); 58.10 (e); 58.14 | Yes, pages 9-10 | Yes | AQMD indicated their intent to submit proposals to discontinue all monitoring (PM ₁₀ and meteorology) at Plumb Kit, discontinue PM ₁₀ monitoring at South Reno, and initiate a new site in West Reno/Verdi. In order for EPA to act on these modifications, AQMD must submit a formal proposal indicating whether the modifications meet the criteria provided in 40 CFR 58.14. EPA has received such requests for discontinuing all monitoring at Plumb Kit and PM ₁₀ monitoring at South Reno. These requests are under review by EPA. We will send separate letters communicating the results of our review. If approved, please include copies of the approval letters in next year's plan. |

¹ Unless otherwise noted.

² Response options: NA (Not Applicable), Yes, No, or Incomplete.

³ Assuming the information is correct.

⁴ Response options: NA (Not Applicable) – [reason], Yes, No, Insufficient to Judge, or Incorrect

| | ANP requirement | Citation within 40 CFR 58¹ | Was the information submitted?² If yes, page #s. | Does the information provided³ meet the requirement?⁴ | Notes |
|-----|--|---|--|--|--|
| 5. | Modifications to SLAMS network – case when we are approving system modifications per 58.14 | 58.10 (a)(2); 58.10 (b)(5); 58.10 (e); 58.14 | NA | NA | |
| 6. | Does plan include documentation (e.g., attached approval letter) for system modifications that have been approved since last ANP approval? | | Yes, Appendix B | Yes | AQMD included documentation of EPA approval of closure of CO monitors at Lemmon Valley and Toll, which was approved by EPA on January 10, 2017. AQMD also included documentation of a previous approval by EPA for initialization of new monitoring at Spanish Springs, which was approved prior to the last annual network plan submission. |
| 7. | Any proposals to remove or move a monitoring station within a period of 18 months following plan submittal | 58.10 (b)(5) | Yes, pages 9-10, Detailed Site Information | Yes | The detailed site table entry for “Proposed modifications within the next 18 months?” for South Reno PM ₁₀ is “None.” AQMD discusses a planned request to terminate this monitor on Page 10, and EPA is currently reviewing a formal request for this termination as submitted by AQMD. Please update this table entry to reflect this proposed change in next year’s plan. |
| 8. | Precision/Accuracy reports submitted to AQS | 58.16 (a) | Yes, page 11 | Yes | |
| 9. | Annual data certification submitted | 58.15 | Yes, page 11 | Yes | |
| 10. | Statement that SPMs operating an FRM/FEM/ARM that meet Appendix E also meet either Appendix A or an approved alternative. Documentation for any Appendix A approved alternative should be included. ⁵ | 58.11 (a)(2) | NA | NA | Please note that no statement was provided for the Spanish Springs SPMs. Since these monitors did not begin operation until 2017, AQMD is meeting the requirement for this network plan, however, please address this checklist item for the Spanish Springs SPMs in next year’s plan. Note that if checklist item #3 is addressed, that may meet the requirement for this checklist item as well. |
| 11. | SPMs operating FRM/FEM/ARM monitors for over 24 months are listed as comparable to the NAAQS or the agency provided documentation that requirements from Appendices A, C, or E were not met. ⁶ | 58.20 (c) | NA | NA | AQMD has not operated any SPMs for over 24 months. |

⁵ Alternatives to the requirements of appendix A may be approved for an SPM site as part of the approval of the annual monitoring plan, or separately.

⁶ This requirement only applies to monitors that are eligible for comparison to the NAAQS per 40 CFR §§58.11(e) and 58.30.

| | ANP requirement | Citation within 40 CFR 58 ¹ | Was the information submitted? ² If yes, page #s. | Does the information provided ³ meet the requirement? ⁴ | Notes |
|-----|--|--|--|---|-------|
| 12. | For agencies that share monitoring responsibilities in an MSA/CSA: this agency meets full monitoring requirements or an agreement between the affected agencies and the EPA Regional Administrator is in place | App D 2(e) | NA | NA | |

GENERAL PARTICULATE MONITORING REQUIREMENTS (PM₁₀, PM_{2.5}, Pb-TSP, Pb-PM₁₀)

| | | | | | |
|-----|---|------------------------------------|--------------------------------|-----|--|
| 13. | Designation of a primary monitor if there is more than one monitor for a pollutant at a site. | App. A 3.2.3 | Yes, Detailed Site Information | Yes | |
| 14. | Distance between QA collocated monitors. For low volume PM instruments (flow rate < 200 liters/minute) > 1 m. For high volume PM instruments (flow rate > 200 liters/minute) > 2m. [Note: waiver request or the date of previous waiver approval must be included if the distance deviates from requirement.] | App. A 3.2.3.4 (c) and 3.3.4.2 (c) | Yes, Detailed Site Information | Yes | |

PM_{2.5}—SPECIFIC MONITORING REQUIREMENTS

| | | | | | |
|-----|---|----------------------------|--------------|-----|--|
| 15. | Document how states and local agencies provide for the review of changes to a PM _{2.5} monitoring network that impact the location of a violating PM _{2.5} monitor. | 58.10 (c) | Yes, page 11 | Yes | |
| 16. | Identification of any PM _{2.5} FEMs and/or ARMs not eligible to be compared to the NAAQS due to poor comparability to FRM(s) [Note 1: must include required data assessment.] [Note 2: Required SLAMS must monitor PM _{2.5} with <u>NAAQS-comparable</u> monitor at the required sample frequency.] | 58.10 (b)(13) 58.11 (e) | NA | NA | |

| | ANP requirement | Citation within 40 CFR 58 ¹ | Was the information submitted? ² If yes, page #s. | Does the information provided ³ meet the requirement? ⁴ | Notes |
|-----|--|--|--|---|--|
| 17. | Minimum # of monitoring sites for PM _{2.5} [Note 1: should be supported by MSA ID, MSA population, DV, # monitoring sites, and # required monitoring sites] [Note 2: Only monitors considered to be required SLAMs are eligible to be counted towards meeting minimum monitoring requirements.] | App. D 4.7.1(a) and Table D-5 | Yes, page 4 | Yes | While AQMD is meeting the requirement, note that the count of the total number of sites includes the SPM operating at Spanish Springs. This monitor is an SPM that has been operating for fewer than 24 months, and did not begin monitoring until 2017. This monitor therefore should not be counted towards meeting minimum monitoring requirements in this plan or next year's plan. The intent is to convert this monitor to a SLAMS monitor after 18 months of operation, which EPA has approved; once converted to a SLAMS monitor, it is eligible to be counted towards minimum monitoring requirements. Also, please note that based on 2016 design values, the number of required sites for PM _{2.5} is 0, not 1 as given in the table. Please update this as needed in next year's plan, based on updated design values. |
| 18. | Requirements for continuous PM _{2.5} monitoring (number of monitors and collocation) | App. D 4.7.2 | Yes, page 5 | Yes | While meeting the requirement, please note that based on 2016 design values, the number of required continuous PM _{2.5} monitors is 0, not 1 as given in the table. Please update this as needed in next year's plan, based on updated design values. |
| 19. | FRM/FEM/ARM PM _{2.5} QA collocation | App. A 3.2.3 | Yes, page 8 | Yes | The PM _{2.5} SPM at Spanish Springs was not included in calculations of the number of required QA collocation monitors. Please note that if PM _{2.5} SPMs operate for more than 24 months or are converted to SLAMS, they must be included in this calculation, as QA collocation is an Appendix A requirement; this may affect future network plans. |
| 20. | PM _{2.5} Chemical Speciation requirements for official STN sites | App. D 4.7.4 | Yes, page 26 | Yes | |
| 21. | Identification of sites suitable and sites not suitable for comparison to the annual PM _{2.5} NAAQS as described in Part 58.30 | 58.10 (b)(7) | Yes, Detailed Site Information | Yes | |
| 22. | Required PM _{2.5} sites represent area-wide air quality | App. D 4.7.1(b) | Yes, Detailed Site Information | Yes | |

| | ANP requirement | Citation within 40 CFR 58¹ | Was the information submitted?² If yes, page #s. | Does the information provided³ meet the requirement?⁴ | Notes |
|-----|---|--|--|--|---|
| 23. | For PM _{2.5} , within each MSA, at least one site at neighborhood or larger scale in an area of expected maximum concentration | App. D 4.7.1(b)(1) | Yes, page 4, Detailed Site Information | Yes | Sparks is listed as the maximum PM _{2.5} site. |
| 24. | If additional SLAMS PM _{2.5} is required, there is a site in an area of poor air quality | App. D 4.7.1(b)(3) | NA | NA | |
| 25. | States must have at least one PM _{2.5} regional background and one PM _{2.5} regional transport site. | App. D 4.7.3 | NA | NA | This requirement is met by other agencies in the state. |
| 26. | Sampling schedule for PM _{2.5} - applies to year-round and seasonal sampling schedules (note: date of waiver approval must be included if the sampling season deviates from requirement) | 58.10 (b)(4); 58.12(d); App. D 4.7 | Yes, Detailed Site Information | Yes | |
| 27. | Frequency of flow rate verification for automated and manual PM _{2.5} monitors | App. A 3.2.1 | Yes, Detailed Site Information | Yes | |
| 28. | Dates of two semi-annual flow rate audits conducted in CY2016 for PM _{2.5} monitors [Note: 5 -7 month interval is recommended but not a requirement.] | App. A 3.2.2 | Yes, Detailed Site Information | Yes | |

| | ANP requirement | Citation within 40 CFR 58 ¹ | Was the information submitted? ² If yes, page #s. | Does the information provided ³ meet the requirement? ⁴ | Notes |
|--|-----------------|--|--|---|-------|
|--|-----------------|--|--|---|-------|

PM₁₀ –SPECIFIC MONITORING REQUIREMENTS

| | | | | | |
|-----|--|-------------------------------|-------------|-----|--|
| 29. | Minimum # of monitoring sites for PM ₁₀ [Note: Only monitors considered to be required SLAMs are eligible to be counted towards meeting minimum monitoring requirements.] | App. D, 4.6 (a) and Table D-4 | Yes, page 5 | Yes | <p>While AQMD is meeting the requirement, note that the count of the total number of sites includes the SPM operating at Spanish Springs. This monitor is an SPM that has been operating for fewer than 24 months, and did not begin monitoring until 2017. This monitor therefore should not be counted towards meeting minimum monitoring requirements in this plan or next year's plan. The intent is to convert this monitor to a SLAMS monitor after 18 months of operation, which EPA has approved; once converted to a SLAMS monitor, it is eligible to be counted towards minimum monitoring requirements.</p> <p>Also, please note that the maximum concentration provided in Table 5 should be the maximum observed over the last 3 years, not the maximum observed in 2016. Based on the maximum concentration observed over the last 3 years, the number of required sites for PM₁₀ should be 1-2, not 0-1 as given in the table. Please update this as needed in next year's plan based on updated concentrations.</p> |
|-----|--|-------------------------------|-------------|-----|--|

| | ANP requirement | Citation within 40 CFR 58 ¹ | Was the information submitted? ² If yes, page #s. | Does the information provided ³ meet the requirement? ⁴ | Notes |
|-----|--|--|--|---|---|
| 30. | Manual PM ₁₀ method collocation (note: continuous PM ₁₀ does not have this requirement) | App. A 3.3.4 | Yes, Detailed Site Information | Insufficient to judge | AQMD operates a manual PM ₁₀ monitor at Reno3. AQMD's plan includes the following statement: "The PM ₁₀ manual method monitor at NCore is for PM _{coarse} calculation only and is not submitted to AQS for data to be used in comparison to the NAAQS." However, the detailed site table for the manual PM ₁₀ monitor indicates that the data is submitted to both the regulatory, NAAQS-comparable parameter code 81102 as well as the nonregulatory code for PM ₁₀ in local conditions, 85101. EPA has confirmed that this data is loaded to AQS under 81102. If these data are being used for NAAQS comparison, there is a requirement for a collocated PM ₁₀ monitor at this site. Please work with EPA to determine a path forward with respect to the reporting and use of data from the manual PM ₁₀ monitor. |
| 31. | Sampling schedule for PM ₁₀ | 58.10 (b)(4); 58.12(e); App. D 4.6 | Yes, Detailed Site Information | Yes | |
| 32. | Frequency of flow rate verification for automated and manual PM ₁₀ monitors | App. A 3.3.1 and 3.3.2 | Yes, Detailed Site Information | Yes | |
| 33. | Dates of two semi-annual flow rate audits conducted in CY2016 for PM ₁₀ monitors [Note: 5 -7 month interval is recommended but not a requirement.] | App. A 3.3.3 | Yes, Detailed Site Information | Yes | |

Pb –SPECIFIC MONITORING REQUIREMENTS

| | | | | | |
|-----|--|-----------------------|-------------|-----|----------------|
| 34. | Minimum # of monitors for non-NCore Pb [Note: Only monitors considered to be required SLAMs are eligible to be counted towards meeting minimum monitoring requirements.] | App D 4.5 | Yes, page 7 | Yes | None required. |
| 35. | Pb collocation: for non-NCore sites | App A 3.4.4 and 3.4.5 | NA | NA | |
| 36. | Any source-oriented Pb site for which a waiver has been granted by EPA Regional Administrator | 58.10 (b)(10) | NA | NA | |
| 37. | Any Pb monitor for which a waiver has been requested or granted by EPA Regional Administrator for use of Pb-PM ₁₀ in lieu of Pb-TSP | 58.10 (b)(11) | NA | NA | |

| | ANP requirement | Citation within 40 CFR 58¹ | Was the information submitted?² If yes, page #s. | Does the information provided³ meet the requirement?⁴ | Notes |
|-----|---|---|--|--|--------------|
| 38. | Designation of any Pb monitors as either source-oriented or non-source-oriented | 58.10 (b)(9) | NA | NA | |
| 39. | Sampling schedule for Pb | 58.10 (b)(4); 58.12(b); App A 3.4.4.2 (c) and 3.4.5.3 (c) | NA | NA | |
| 40. | Frequency of flow rate verification for Pb monitors audit | App A 3.4.1 and 3.4.2 | NA | NA | |
| 41. | Dates of two semi-annual flow rate audits conducted in CY2016 for Pb monitors [Note: 5 -7 month interval is recommended but not a requirement.] | App A 3.4.3 | NA | NA | |

GENERAL GASEOUS MONITORING REQUIREMENTS

| | | | | | |
|-----|--|--------------|--------------------------------|-----|--|
| 42. | Frequency of one-point QC check (gaseous) | App. A 3.1.1 | Yes, Detailed Site Information | Yes | |
| 43. | Date of Annual Performance Evaluation (gaseous) conducted in CY2016 | App. A 3.1.2 | Yes, Detailed Site Information | Yes | |

O₃ -SPECIFIC MONITORING REQUIREMENTS

| | | | | | |
|-----|--|----------------------------|--|-----|---|
| 44. | Minimum # of monitoring sites for O ₃ [Note 1: should be supported by MSA ID, MSA population, DV, # monitoring sites, and # required monitoring sites] [Note 2: Only monitors considered to be required SLAMs are eligible to be counted towards meeting minimum monitoring requirements.] [Note 3: monitors that do not meet traffic count/distance requirements to be neighborhood or urban scale (40 CFR Appendix E, Table E-1) cannot be counted towards meeting minimum monitoring requirements] | App D 4.1(a) and Table D-2 | Yes, page 4 | Yes | While AQMD is meeting the requirement, note that the count of the total number of sites includes the SPM operating at Spanish Springs. This monitor is an SPM that has been operating for fewer than 24 months, and did not begin monitoring until 2017. This monitor therefore should not be counted towards meeting minimum monitoring requirements in this plan or next year's plan. The intent is to convert this monitor to a SLAMS monitor after 18 months of operation, which EPA has approved; once converted to a SLAMS monitor, it is eligible to be counted towards minimum monitoring requirements. |
| 45. | Identification of maximum concentration O ₃ site(s) | App D 4.1 (b) | Yes, page 4, Detailed Site Information | Yes | Reno3 is listed as the maximum concentration site for O ₃ . |

| | ANP requirement | Citation within 40 CFR 58 ¹ | Was the information submitted? ² If yes, page #s. | Does the information provided ³ meet the requirement? ⁴ | Notes |
|-----|--|--|--|---|-------|
| 46. | Sampling season for O ₃ (Note: Waivers must be renewed annually. EPA expects agencies to submit re-evaluations of the relevant data each year with the ANP. EPA will then respond as part of the ANP response.) | 58.10 (b)(4); App D 4.1(i) | Yes, Detailed Site Information | Yes | |

NO₂ –SPECIFIC MONITORING REQUIREMENTS

| | | | | | |
|-----|---|---------------|-------------|-----|----------------|
| 47. | Minimum monitoring requirements for area-wide NO ₂ monitor in location of expected highest NO ₂ concentrations representing neighborhood or larger scale (operation required by 1/1/13) | App D 4.3.3 | Yes, page 5 | Yes | None required. |
| 48. | Minimum monitoring requirements for susceptible and vulnerable populations monitoring (aka RA40) NO ₂ (operation required by January 1, 2013) | App D 4.3.4 | NA | NA | None required. |
| 49. | Identification of required NO ₂ monitors as either near-road, area-wide, or vulnerable and susceptible population (aka RA40) | 58.10 (b)(12) | NA | NA | |

NEAR ROADWAY – SPECIFIC MONITORING REQUIREMENTS

In CBSAs ≥ 2.5 million, the following near-roadway minimum monitoring requirements apply:

| | | | | | |
|-----|-------------------------------|--------------------------------------|----|----|--|
| 50. | Two NO ₂ monitors | App. D 4.3.2(a); 58.13(c)(3) and (4) | NA | NA | |
| 51. | One CO monitor | App. D 4.2.1(a); 58.13(e)(2) | NA | NA | |
| 52. | One PM _{2.5} monitor | App. D 4.7.1(b)(2); 58.13(f)(2) | NA | NA | |

In CBSAs ≥ 1 million and AADT $\geq 250K$, the following near-roadway minimum monitoring requirements apply:

| | | | | | |
|-----|------------------------------|--------------------------------------|----|----|--|
| 53. | Two NO ₂ monitors | App. D 4.3.2(a); 58.13(c)(3) and (4) | NA | NA | |
|-----|------------------------------|--------------------------------------|----|----|--|

| | ANP requirement | Citation within 40 CFR 58¹ | Was the information submitted?² If yes, page #s. | Does the information provided³ meet the requirement?⁴ | Notes |
|--|---|--|--|--|----------------|
| 54. | One CO monitor (by 1/1/2017) | App. D 4.2.1(a); 58.13(e)(2) | NA | NA | |
| 55. | One PM _{2.5} monitor (by 1/1/2017) | App. D 4.7.1(b)(2); 58.13(f)(2) | NA | NA | |
| In CBSAs ≥ 1 million and ≤ 2.5 million AND AADT $< 250K$, the following near-roadway minimum monitoring requirements apply: | | | | | |
| 56. | One NO ₂ monitors | App. D 4.3.2(a); 58.13(c)(3) | NA | NA | |
| 57. | One CO monitor (by 1/1/2017) | App. D 4.2.1(a); 58.13(e)(2) | NA | NA | |
| 58. | One PM _{2.5} monitor (by 1/1/2017) | App. D 4.7.1(b)(2); 58.13(f)(2) | NA | NA | |
| SO₂ –SPECIFIC MONITORING REQUIREMENTS | | | | | |
| 59. | Minimum monitoring requirements for SO ₂ based on PWEI and/or RA required monitors under Appendix D 4.4.3 [Note: Only monitors considered to be required SLAMs are eligible to be counted towards meeting minimum monitoring requirements.] | App D 4.4 | Yes, page 6 | Yes | None required. |
| 60. | Monitors used to meet Data Requirements Rule (operational no later than January 1, 2017.) | 51.1203(c) | NA | NA | None required. |
| NCORE –SPECIFIC MONITORING REQUIREMENTS | | | | | |
| 61. | NCore site and all required parameters operational: year-round O ₃ , SO ₂ , CO, NO _y , NO, PM _{2.5} mass, PM _{2.5} continuous, PM _{2.5} speciation, PM _{10-2.5} mass, resultant wind speed at 10m, resultant wind direction at 10m, ambient temperature, relative humidity. NO _y waiver, if applicable. | App. D 3(b) | Yes, pages 24-30 | Yes | |
| SITE OR MONITOR - SPECIFIC REQUIREMENTS (OFTEN INCLUDED IN DETAILED SITE INFORMATION TABLES) | | | | | |
| 62. | AQS site identification number for each site | 58.10 (b)(1) | Yes, Detailed Site Information | Yes | |

| | ANP requirement | Citation within 40 CFR 58 ¹ | Was the information submitted? ² If yes, page #s. | Does the information provided ³ meet the requirement? ⁴ | Notes |
|-----|--|---|--|---|---|
| 63. | Location of each site: street address and geographic coordinates | 58.10 (b)(2) | Yes, Detailed Site Information | Yes | |
| 64. | MSA, CBSA, CSA or other area represented by the monitor | 58.10 (b)(8) | Yes, Detailed Site Information | Yes | |
| 65. | Parameter occurrence code for each monitor | Needed to determine if other requirements (e.g., min # and collocation) are met | Yes, Detailed Site Information | Incorrect in one instance | Both NO monitors (from NO _x and NO _y instruments) at Reno3 are listed as POC 1. Please clarify which monitor is POC 1 for NO and provide the correct POC for the other instrument. |
| 66. | Basic monitoring objective for each monitor | App D 1.1; 58.10 (b)(6) | Yes, Detailed Site Information | Yes | <p>NAAQS Comparison should not be the monitoring objective for NO and NO_x monitors at Reno3, or for PM_{10-2.5} at Spanish Springs and Sparks. Please update this in next year's plan.</p> <p>Note that NAAQS Comparison is listed as an objective for PM₁₀, PM_{2.5}, and O₃ monitors at Spanish Springs. While these monitors are currently SPMs operating fewer than 24 months and are therefore not eligible for comparison to the NAAQS, AQMD intends to convert these to SLAMS after 18 months of operation, and therefore this monitoring objective is appropriate.</p> |
| 67. | Site type for each monitor | App D 1.1.1 | Yes, Detailed Site Information | Yes | |
| 68. | Monitor type for each monitor, and Network Affiliation(s) as appropriate | Needed to determine if other requirements (e.g., min # and collocation) are met | Yes, Detailed Site Information | Yes | |

| | ANP requirement | Citation within 40 CFR 58 ¹ | Was the information submitted? ² If yes, page #s. | Does the information provided ³ meet the requirement? ⁴ | Notes |
|-----|---|---|--|---|--|
| 69. | Scale of representativeness for each monitor as defined in Appendix D | 58.10(b)(6); App D | Yes, Detailed Site Information | Yes | For Toll, the plan states that "Due to the distance from the probe to the nearest roadway, this is a middle scale site for CO." Based on the distance to road and traffic count provided, this site would be characterized as neighborhood scale for CO. AQMD may choose to continue to characterize it as middle scale if it is impacted by other CO sources, but if not, AQMD may want to consider changing the scale provided for this monitor. |
| 70. | Parameter code for each monitor | Needed to determine if other requirements (e.g., min # and collocation) are met | Yes, Detailed Site Information | Yes | |
| 71. | Method code and description (e.g., manufacturer & model) for each monitor | 58.10 (b)(3); App C 2.4.1.2 | Yes, Detailed Site Information | Yes | |
| 72. | Sampling start date for each monitor | Needed to determine if other requirements (e.g., min # and collocation) are met | Yes, Detailed Site Information | Yes | |
| 73. | Distance of monitor from nearest road | App E 6 | Yes, Detailed Site Information | Yes | While meeting the requirement, please provide the traffic count for and distance to nearby local roads for the Spanish Springs SPM site. These roads are closer than the road for which the traffic count was provided. |

| | ANP requirement | Citation within 40 CFR 58 ¹ | Was the information submitted? ² If yes, page #s. | Does the information provided ³ meet the requirement? ⁴ | Notes |
|-----|---|--|--|---|---|
| 74. | Traffic count of nearest road | App E | Yes, Detailed Site Information | Insufficient to judge in some instances | <p>A traffic count estimate is needed for Mill St. near the Reno3 site. This site is listed as 13.1m away from the street, so a traffic count is required to be able to assess siting requirements.</p> <p>Traffic count estimates are also needed for the following roads at the following sites, although based on other information in the plan including distances, these roads are unlikely to affect the provided scale of representativeness:</p> <ul style="list-style-type: none"> • 4th Street (at the Sparks site) • Delucchi Lane (at the South Reno site) |
| 75. | Groundcover | App E 3(a) | Yes, Detailed Site Information | Yes | |
| 76. | Probe height | App E 2 | Yes, Detailed Site Information | Yes | |
| 77. | Distance from supporting structure (vertical and horizontal, if applicable, should be provided) | App E 2 | Yes, Detailed Site Information | Yes | |
| 78. | Distance from obstructions on roof (horizontal distance to the obstruction and vertical height of the obstruction above the probe should be provided) | App E 4(b) | Yes, Detailed Site Information | Yes | |
| 79. | Distance from obstructions not on roof (horizontal distance to the obstruction and vertical height of the obstruction above the probe should be provided) | App E 4(a) | Yes, Detailed Site Information | Yes | |
| 80. | Distance from the drip line of closest tree(s) | App E 5 | Yes, Detailed Site Information | Yes | The Incline O ₃ monitor is listed as less than 10m from trees, but includes the following statement: "Trees are not of sufficient height and leaf canopy density to interfere with the normal unrestricted airflow or pollutant scavenging around the monitoring path." |
| 81. | Distance to furnace or incinerator flue | App E 3(b) | Yes, Detailed Site Information | Yes | Distances from flues are included in the plan. Without any indication in the plan otherwise, EPA assumes that the distance to the flue and fuel burned does not constitute an inappropriate source at these sites. |
| 82. | Unrestricted airflow (expressed as degrees around probe/inlet or percentage of monitoring path) | App E, 4(a) and 4(b) | Yes, Detailed Site Information | Yes | |

| | ANP requirement | Citation within 40 CFR 58 ¹ | Was the information submitted? ² If yes, page #s. | Does the information provided ³ meet the requirement? ⁴ | Notes |
|-----|---|--|--|---|-------|
| 83. | Probe material (NO/NO ₂ /NO _y , SO ₂ , O ₃ ; For PAMS: VOCs, Carbonyls) | App E 9 | Yes, Detailed Site Information | Yes | |
| 84. | Residence time (NO/NO ₂ /NO _y , SO ₂ , O ₃ ; For PAMS: VOCs, Carbonyls) | App E 9 | Yes, Detailed Site Information | Yes | |

Public Comments on Annual Network Plan

| | |
|--|----|
| Were comments submitted to the S/L/T agency during the public comment period? | No |
| Were comments included in ANP submittal? | NA |
| Were any of the comments substantive? If yes, which ones? If comments were not substantive provide rationale. | NA |
| Were S/L/T responses to substantive comments included in ANP submittal? | NA |
| Were the S/L/T responses to substantive comments adequate? | NA |
| Do the substantive comments require separate EPA response (i.e., agency response wasn't adequate)? | NA |
| Are the sections of the annual network plan that received substantive comments approvable after consideration of comments? If yes, provide rationale | NA |

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Attachment B

Washoe County District Board of Health Regulations Governing Air Quality Management Not Included in the Washoe County Portion of the Nevada Ozone Infrastructure SIP But Further Support CAA 110(a)(2)(A)-(M) Requirements

010.1303

"REGULATED AIR POLLUTANT" shall mean the following:

1. Nitrogen oxides or any volatile organic compounds;
2. Any pollutant for which a national ambient air quality standard has been promulgated.
3. Any pollutant that is subject to any standard promulgated under section 111 of the Act.
4. Any class I or II substance subject to a standard promulgated under or established by title VI of the Act.
5. Any pollutant subject to a standard promulgated under section 112 or other requirements established under section 112 of the Act, including the following:
 - a. Any pollutant subject to requirements under section 112(j) of the Act. If the administrator fails to promulgate a standard pursuant to section 112(e) of the Act, any pollutant for which a subject source would be major shall be considered to be regulated on the date 18 months after the applicable date established pursuant to section 112(e) of the Act; and
 - b. Any pollutant for which the requirements of section 112(g)(2) of the Act have been met, but only with respect to the individual source subject to section 112(g)(2) requirement.

(Adopted 10/20/93)

020.0051

BOARD OF HEALTH - POWERS AND DUTIES

Pursuant to the powers and responsibilities that have inured to the benefit of the Board of Health, said Board shall, without excluding any other powers, responsibilities, and authority conferred on said Board in the Nevada Revised Statutes, have the following powers and/or responsibilities:

- A. To adopt and enforce rules and regulations to reduce the release into the atmosphere of any air contaminants originating within the territorial limits of the Washoe County Health District in order to achieve and maintain levels of air quality which will protect human health and safety, prevent injury to plant and animal life, prevent damage to property, and preserve visibility and scenic, aesthetic and historic value within said Health District.
- B. To establish ambient air quality standards in accordance with law.
- C. To make such determinations and issue such orders as may be necessary to implement the provisions of these regulations and to achieve air quality standards in accordance with law.
- D. To institute proceedings to prevent continued violation of any order issued by the Board of Health, Hearing Board, or Control Officer, and to enforce these regulations.
- E. To require access to records relating to emissions which cause or contribute to air pollution.
- F. To apply or and receive grants or other funds or gifts from public or private agencies.
- G. To cooperate and contract with other governmental agencies including the State of Nevada, other states, and the federal government.

- H. To conduct investigations, research and technical studies consistent with the general purposes of the Nevada Revised Statutes.
- I. To establish such emission control requirements, as may be necessary to prevent, abate, or control air pollution.
- J. To require the registration of air pollution sources together with a description of the processes employed, fuels used, nature of emissions and other information considered necessary to evaluate the pollution potential of a source.
- K. To prohibit, regulate or control, as specifically provided in **Section 030.000** through **030.260**, the installation, alteration or establishment of any source capable of causing air pollution.
- L. To issue or deny all requests or applications for a variance or waiver from any of the requirements of these regulations after due consideration of the recommendations of the Hearing Board and Control Officer.
- M. To require the submission of preliminary plans and specifications and other information as the Board deems necessary to process permits required by these regulations.
- N. To enter into and inspect, at any reasonable time, any premises containing an air contaminant source or a source under construction for purposes of ascertaining the state of compliance with these regulations.
- O. To hold any hearing as authorized in Chapter 445 of the Nevada Revised Statutes.
- P. To review recommendations of the Hearing Board and to take such additional evidence as the Board of Health deems necessary or to remand to the Hearing Board for such evidence as the Board of Health may direct on any matters arising under these regulations.
- Q. To require elimination of devices or practices which cannot be reasonably allowed without generation of undue amounts of contaminants.
- R. To specify the manner in which incinerators may be constructed and operated.
- S. To delegate all above powers, except **Subsections A, B, F, O, and P**, to the Control Officer or his representatives as may be necessary to implement these regulations.
- T. To appoint by resolution, or other appropriate action of the Board of Health, a Hearing Board consisting of seven (7) members who are not employees of the State of Nevada or any political subdivision of the State of Nevada, or which one (1) member must be an attorney admitted to practice law in the State of Nevada, or which one (1) member must be a professional engineer registered in the State of Nevada and one (1) member shall be licensed in Nevada as a general engineering contractor or a general building contractor as defined by NRS 624.215. All members of said Hearing Board shall be appointed to the terms as specified in NRS 445.481.
- U. To institute, in any court of competent jurisdiction, legal proceedings to compel compliance

with these regulations and the Nevada Revised Statutes pertaining to the emission of air contaminants into the atmosphere within the territorial limits of the Washoe County Health District.

020.020 CONTROL OFFICER - POWER AND DUTIES

The Control Officer, or his designated agent or representative, shall enforce the provisions of these regulations in his name, or in the name of the Board of Health, in any one or combination of the following ways:

- A. By issuing a written notice of violation, delivered personally or by registered or certified mail, to any person if reasonable cause exists to believe said person is violating these regulations.
- B. By issuing a warning to any person suspected of violating these regulations and by giving said person an opportunity to correct the cause of said violation prior to issuing a notice of violation or citation and referring the matter to the Board of Health or proper prosecuting authority in the Washoe County Health District;
- C. By requesting the District Attorney of the County of Washoe, or other proper agency, person or prosecuting authority in the Washoe County Health District, to institute appropriate criminal, civil or administrative proceedings against the person or persons responsible for violation of any of these regulations.
- D. By requesting the Board of Health to levy an appropriate administrative fine against any person found to have violated any of these regulations.
- E. By reviewing each variance to ascertain if the variance holder is meeting all provisions of the variance or dates set forth in the compliance schedule; if they are not met, the Control Officer may notify the variance holder personally or by registered or certified mail to this effect and may suspend or revoke any variances or reject any schedule of compliance involved with said infractions.
- F. By requesting the Board of Health to institute all necessary and proper legal proceedings authorized by law to carry out the purposes of these regulations and purposes of Chapter 445 of the Nevada Revised Statutes, including injunctive relief.

020.060 SAMPLING AND TESTING

In addition to any other testing requirements provided for in these regulations, the Control Officer or the Board of Health may require any person to conduct or make arrangements to conduct testing of any source to determine compliance with these regulations. In the event such testing is required, the Control Officer may do any of the following:

- A. Witness all tests as required by this Section.
- B. Determine whether or not generally recognized methods of measurement have been used to determine the quantity of emissions from the source being tested and if not additional testing may be required.

- C. Determine the point or points at or within the source where testing shall be done, to determine the actual discharge into the atmosphere.
- D. Make any modifications or adjustments in the testing requirements so as to be compatible with specific sampling conditions or needs as shown by good practice, judgement and experience.
- E. Require the cost of any testing to be paid by the owner or person responsible for any source of air contaminants.
- F. Require additional tests of any source of air contaminants tested in accordance with this Section, provided such separate or additional tests shall be conducted on behalf of the Board of Health and at said Board's expense.
- G. Require in writing the construction or creation of sampling holes, safe scaffolding and related facilities, to be provided at the expense of the owner or person responsible for any source of air contaminants being tested in accordance with this section.
- H. Require the owner or person responsible for any source of any air contaminants being tested pursuant to this section to provide a suitable power source to the point of testing, so that sampling instruments can be operated as required.
- I. All information gathered during any testing operation conducted pursuant to this Section will be provided to both the Control Officer or the Board of Health and the person or persons who own or control or are responsible for any source of air contaminants that are tested pursuant to this Section. All such information obtained pursuant to any testing required under this Section will be treated as confidential in accordance with the requirements of **Section 020.055** of these regulations.

030.002 CONSTRUCTION OR MODIFICATION OF PERMITTED OPERATIONS (Amended 4/89, 10/20/93)

A written Authority to Construct shall be required to construct, erect, alter or replace any equipment which may cause, potentially cause, reduce, control or eliminate the issuance of air contaminants. A single Authority to Construct may be issued for all components of an integrated system or process. Plans and specifications drawn in accordance with acceptable engineering practices shall be required before issuance of an Authority to Construct. The applicant for any Authority to Construct must notify the Control Officer in the application of any source which is or will become subject to 40 CFR Part 70 upon completion of the proposed construction. An Authority to Construct is not needed for routine operation and maintenance. This includes maintenance prescribed by the manufacturer, replacement of worn or broken components with like equipment, etc.

030.500 NEW SOURCE REVIEW (NSR) APPLICABILITY

A major new source or major modification which would locate in an area designated as nonattainment for a pollutant for which the source or modification would be major shall not be allowed to construct unless the stringent conditions set forth below are met. These conditions are designed to insure that the new source's or modification's emission will be controlled to the greatest degree possible, that more than equivalent offsetting emission reductions ("emission offsets") will be progress toward achievement of the national ambient air quality standards. For

the purposes of this part, a reconstructed source shall be treated as a new stationary source. Since major facility definition and requirements vary upon State and EPA area designations, a map (**Figure 1**) is included to facilitate the determination of which requirements must be met.

030.502 REVIEW FOR EMISSION LIMITATION COMPLIANCE

Authority to construct any new source or modification shall be denied unless the new source or modification meets all applicable emission requirements in the Nevada State Implementation Plan (SIP), all applicable Federal New Source Performance Standards, and all applicable National Emission Standards For Hazardous Air Pollutants.

030.503 CONDITIONS FOR APPROVAL (Amended 7/28/93, Revised 10/25/95)

If a major stationary source or major modification would be constructed in an area designated as nonattainment for a pollutant for which the stationary source or modification is major, an Authority to Construct shall be denied unless the following conditions are met:

- Condition 1 The new source or modification is required to meet an emission limitation which specifies lowest achievable emission rate for such source.
- Condition 2 The applicant must certify that all existing major sources owned or operated by the applicant for any entity controlling, controlled by, or under common control of the applicant in the State of Nevada are in compliance with all applicable emission limitations and standards under the Clean Air Act (or are in compliance with an expeditious schedule which is federally enforceable or contained in a court decree).
- Condition 3 Emission reductions ("offsets") from existing sources in the same nonattainment area as the proposed new source or modification (whether or not under the same ownership) are required such that they shall not interfere with or contribute to the interference with the attainment of the applicable National Ambient Air Quality Standards. Only intrapollutant emission offsets will be acceptable (e.g. hydrocarbon increases may not be offset against SO₂ reductions). All emission reductions for the purpose of offsets shall be enforceable under the Clean Air Act.

The terms of the offset emission reductions shall be specified and federally enforceable prior to permit issuance.

All offset emissions reductions shall be, by the time a new or modified source commences operation, in effect and enforceable and shall assure that the total tonnage of increased emissions of the air pollutant from the new or modified source shall be offset by an equal or greater reduction.

All offset emissions reductions must be obtained from decreases in actual emissions from the same or other sources in the area. No emissions reductions otherwise required by the Clean Air Act or other regulatory action may be credited for the purpose of meeting offset requirements.

- Condition 4 The emission offsets will provide a positive net air quality benefit in the affected area. Atmospheric simulation modeling is not necessary for volatile organic compounds and NOX. Fulfillment of **Condition 3** and **Section 030.504** of these regulations will be considered adequate to meet this condition.
- Condition 5 The applicant must perform an analysis of at least two (2) alternative sites for the facility, production processes, and environmental control techniques. This analysis must demonstrate that the benefits of the proposed source significantly outweigh the environmental and social costs imposed as a result of its location, construction or modification.
- Condition 6 The Control Officer shall also require the review of any Major Stationary Source or Major Modification subject to New Source Review under this section that may have an impact on visibility in any mandatory Class I Federal area. Such visibility review will ensure the source's emissions will be consistent with making reasonable progress toward State and National visibility goals.
- Condition 7 The Administrator has not made a determination that the applicable implementation plan is not being adequately implemented for the attainment area in which the proposed source is to be constructed or modified.
- Condition 8 The proposed major source or major modification shall not contribute to nonattainment in, or interfere with maintenance by, any other State with respect to any national ambient air quality standard, or interfere with measures required to be included in the applicable implementation plan for any other State with respect to prevention of significant deterioration of air quality or to protect visibility.

All emission limitations shall be assessed in light of the limits of "good engineering practice" on stack heights as specified in **Section 030.614**.

Any major stationary source or major modification commencing construction without an Authority to Construct shall be subject to an enforcement action. Obtaining an Authority To Construct does not relieve the owner from complying with any applicable local, state or federal regulation.

At such time that a particular source or modification becomes a major stationary source or major modification solely by virtue of a relaxation in any enforcement limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of regulations approved pursuant to this section shall apply to the source or modification as though construction had not yet commenced on the source or modification. All permits issued by the Control officer shall comply with all applicable terms of the State Implementation Plan for the non-attainment area in which the source is to be constructed.

030.504

EMISSION OFFSET RATIOS (Amended 7/28/93)

Emission reductions required under **Section 030.503** shall be offset at a ratio of 1.2 to 1 when the offset sources are five (5) miles or less from the new source or modification. For offset

sources that are greater than five (5) miles from the new source or modification, the applicant shall determine an offset ratio based on atmospheric simulation modeling or an equivalent method to ensure a positive net air quality benefit. In no case shall the offset ratio for source located greater than five miles from the proposed project be less than 1.2 to 1. Non-reactive organic compounds (those which are listed in 40 CFR 51.100(s)) cannot be used for offsets.

030.505

COMPLETENESS OF APPLICATION

Following submittal by the applicant, the Control Officer shall determine whether the application for permit to construct is complete not later than thirty (30) calendar days after receipt of the application, or after such longer time as both the applicant and the Control Officer may agree. Such determination shall be transmitted in writing immediately to the applicant at the address indicated on the application if it is determined to be incomplete, the determination shall specify which parts of the application are incomplete and how they can be made complete. Upon receipt by the Control Officer of any re-submittal of the application, a new thirty (30) day period in which the Control Officer must determine completeness shall begin. Completeness of an application or resubmitted application shall be evaluated on the basis of the guideline for such, published by the Control Officer. After acceptance of an application as complete, the Control Officer shall not subsequently request of an applicant any new or additional information which was not specified in the Control Officer's list of items to be included within such applications. However, the Control Officer may, during the processing of the application, request an applicant to clarify, amplify, correct or otherwise supplement the information required in such list in effect at the time the complete application was received. Making any such request does not waive, extend, or delay the time limits in this section for decision on the completed application, except as the applicant and Control Officer may both agree.

030.506

REQUIREMENTS FOR PUBLIC NOTICE (Amended 7/28/93, Revised 10/25/95)

For those sources subject to Section 030.500, following acceptance of an application as complete, the Control Officer shall:

- A. Perform the evaluations required to determine compliance with this section and make a preliminary written decision as to whether an Authority to Construct should be approved, conditionally approved, or disapproved. The decision shall be supported by a succinct written analysis;
- B. Within ten (10) calendar days following such decision, publish a notice by prominent advertisement in at least one (1) newspaper of general circulation in the County, stating the preliminary decision of the Control Officer and where the public may inspect the information required to be made available. The notice shall provide thirty (30) days from the date of publication for the publication for the public to submit written comments on the preliminary decision;
- C. At the time notice of the preliminary decision is published, make available for public inspection at the District office the information submitted by the applicant, the supporting analysis for the preliminary decision to grant or deny the Authority to Construct, including any proposed permit conditions, and the reasons therefore. The confidentiality of trade secrets shall be considered in accordance with **Section 020.055** of these regulations;
- D. No later than the date of publication of the notice, a copy of said notice and any appropriate data is to be sent to the Nevada Department of Conservation and Natural

Resources Division of Environmental Protection, the regional planning authority of Washoe County, local government offices, any Indian governing body whose lands may be affected by facility emissions, any Federal Land Manager whose lands may be affected (including visibility effects) and the Regional Office of the U.S. Environmental Protection Agency; and

- E. Applicant to bear cost of all public notices under this section and **Section 030.508**.
- F. The Control Officer shall contact any Federal Land Manager whose lands may be affected for comments on the proposed project within 30 days after the application has been deemed complete. This shall be for the purpose of obtaining comments on the proposed scope of review for affected lands and species.

030.507 COMMENTS

The Control Officer shall consider all written comments submitted during the thirty (30) day public comment period.

030.508 FINAL ACTION (Amended 7/28/93)

Within 180 days after acceptance of the application as complete and the completion of all required preconstruction monitoring and public notice periods (including those required under the District's Part 70 Permit regulations), the Control Officer shall take final action on the application after considering all written comments. The Control Officer shall provide written notice of the final action to the applicant, the U.S. Environmental Protection Agency, other Affected States and the Nevada Department of Conservation and Natural Resources and shall publish such notice in a newspaper of general circulation. The notice and all supporting documents shall be made available for public inspection during normal business hours.

030.905 SOURCES REQUIRING PART 70 PERMITS (Adopted 10/20/93, Revised 10/25/95)

A. Sources Required to Obtain a Part 70 Permit

The following sources and source categories shall be subject to Part 70 permitting:

1. Any Major Stationary Source;
2. Any source, including area sources, subject to a standard, limitation or other requirement under section 111 (New Source Performance Standards) of the Act;
3. Any source, including an area source, subject to a standard or other requirement under section 112 (Hazardous Air Pollutants) of the Act. However, a source which is subject to regulations or requirements only under section 112(r) of the Act shall not be required to obtain a permit;
4. Any source that includes one or more units subject to Title IV (Acid Rain) of the Act;
5. Any source in a source category designated by the EPA Administrator pursuant to 40 CFR Part 70.

B. Exemptions

The following sources and source categories shall be exempted from Part 70 permit requirements:

1. Any source subject to this regulation solely because it is subject to 40 CFR Part 60, subpart AAA, Standards of Performance for New Residential Wood Heaters.
2. Any source subject to this regulation solely because it is subject to 40 CFR Part 61, subpart M, National Emission Standards for Hazardous Air Pollutants for Asbestos, Standards for Demolition and Renovation.

3. Insignificant Emission Levels

Sources with the potential to emit less than an annual average of two (2) pounds per day of any criteria pollutant or less than one (1) pound per day of any hazardous air pollutant on a facility wide basis are exempted from all part 70 permitting requirements. Such sources may still be required by the Control Officer to obtain a non-Part 70 operating permit under District regulations. No source which is itself subject to an applicable requirement may qualify as an insignificant source.

4. All Dry Cleaning operations with the potential to emit less than ten (10) tons per year of any criteria or hazardous air pollutant shall be exempted for a period of five (5) years from the initial EPA Part 70 program approval date unless required to obtain a permit under **Section 030.905(A) (5)**.
5. All sources which would be subject to Part 70 permits under **Section 030.905 (A)** which are not major sources, affected sources or solid waste incineration units subject to permitting under section 129(e) of the act, are exempt from requirements to obtain a Part 70 permit for a period of 5 years from the date of EPA approval of the Washoe County Part 70 permit program.
6. Sources may seek exempt status by limiting facility emissions to levels below those defined for a major source as provided in **Section 010.090, part D (prohibitory status) and part E (Synthetic Minor sources)**.

C. Sources Which Must be Permitted by the State of Nevada

Any facility whose principal business is to generate electricity using steam derived from the burning of fossil fuels must obtain any necessary Part 70 permit(s) from the State of Nevada.

Attachment C

Nevada Division of Environmental Protection, Appendix E “Interstate Transport
Analysis for the 2015 8-Hour Primary Ozone National Ambient Air Quality
Standard”

APPENDIX E

Interstate Transport Analysis for the 2015 8-Hour Primary Ozone National Ambient Air Quality Standard

NOTE TO READERS

Nevada has chosen to link to websites on the internet for many references cited in this appendix. We have backed up these links by putting electronic copies of reference documents on the Nevada Division of Environmental Protection's (NDEP) server. If any of the links in this document do not work for you, you may contact the NDEP Bureau of Air Quality Planning at 901 South Stewart Street, Suite 4001, Carson City, Nevada 89701 or by telephone at 775-687-9349 for assistance.

APPENDIX E

Interstate Transport Analysis for the 2015 8-Hour Primary Ozone National Ambient Air Quality Standard

E.1 INTRODUCTION

Section 110(a)(2)(D)(i)(I) of the Clean Air Act (CAA), also called the “good neighbor” provision, requires each state to prohibit emissions that contribute significantly to nonattainment in, or interfere with maintenance by, any other state with respect to any primary or secondary national ambient air quality standard (NAAQS). The Nevada Division of Environmental Protection (NDEP) analyzed the impact of transport of anthropogenic ozone and ozone precursor emissions from Nevada sources to nonattainment and maintenance receptor areas in nearby states, other western states and eastern states. The NDEP used the following U.S. Environmental Protection Agency (EPA) resources to conduct this analysis.

- *Information on the Interstate Transport State Implementation Plan Submissions for the 2015 Ozone National Ambient Air Quality Standards under Clean Air Act Section 110(a)(2)(D)(i)(I).* Memorandum from Peter Tsirigotis, Director, U.S. EPA Office of Air Quality Planning and Standards, to Regional Air Division Directors, Regions 1-10. March 27, 2018. Available at: https://www.epa.gov/sites/production/files/2018-03/documents/transport_memo_03_27_18_1.pdf.
- *2015 Ozone NAAQS Interstate Transport Assessment Design Values and Contributions.* This file contains projected 2023 design values and 2023 ozone contributions at individual monitoring sites. Available at: <https://www.epa.gov/airmarkets/march-2018-memo-and-supplemental-information-regarding-interstate-transport-sips-2015>
- *Notice of Availability of the Environmental Protection Agency’s Preliminary Interstate Ozone Transport Modeling Data for the 2015 Ozone National Ambient Air Quality Standard (NAAQS),* 82 FR 1733 (January 6, 2017). Available at: <https://www.regulations.gov/document?D=EPA-HQ-OAR-2016-0751-0001>
- *Supplemental Information on the Interstate Transport State Implementation Plan Submissions for the 2008 Ozone National Ambient Air Quality Standards under Clean Air Act Section 110(a)(2)(D)(i)(I).* Memorandum from Stephen D. Page, Director, U.S. EPA Office of Air Quality Planning and Standards, to Regional Air Division Directors, Regions 1-10. October 27, 2017. Available at: https://www.epa.gov/sites/production/files/2017-10/documents/final_2008_o3_naaqs_transport_memo_10-27-17b.pdf. This memorandum includes links to all supporting documentation, including modeling and emissions technical support documents.

The NDEP followed EPA's four-step framework¹ (also referred to as the CSAPR [Cross-State Air Pollution Rule] framework) to address the requirements of the good neighbor provision for ozone. The framework consists of:

- 1) identify downwind air quality problems;
- 2) identify upwind states that contribute enough to those downwind air quality problems to warrant further review and analysis;
- 3) identify the emissions reduction necessary (if any), considering cost and air quality factors, to prevent an identified upwind state from contributing significantly to those downwind air quality problems; and
- 4) adopt permanent and enforceable measures needed to achieve those emissions reductions.

The following sections address the four-step framework, beginning with the identification of 2023 nonattainment and maintenance monitors.

E.2 IDENTIFICATION OF DOWNWIND AIR QUALITY PROBLEMS

Step 1 of the CSAPR framework is identify downwind air quality problems. The EPA uses modeling to identify potential future downwind air quality problems. For the 2015 ozone NAAQS, EPA selected 2023 as the analytic year in their modeling analysis, primarily because it aligns with the attainment year for Moderate ozone nonattainment areas. On March 27, 2018, EPA provided newly available contribution modeling results. EPA's goal in providing this information is to assist states' efforts to develop good neighbor SIPs for the 2015 ozone NAAQS to address their interstate transport obligations.²

"EPA identified nonattainment receptors as those monitoring sites with current measured values exceeding the NAAQS that also have projected (i.e., in 2023) average design values exceeding the NAAQS. EPA identified maintenance receptors as those monitoring sites with maximum design values exceeding the NAAQS, This included sites with current measured values below the NAAQS with projected average and maximum design values exceeding the NAAQS, and monitoring sites with projected average design values below the NAAQS but with projected maximum design values exceeding the NAAQS."³

The EPA contribution modeling identified 12 (the Tsigotis memo mis-identifies the number of nonattainment receptors as 11) monitoring sites outside of California as 2023 potential nonattainment receptors and 14 monitoring sites outside of California as potential maintenance receptors scattered among eight states. The contribution modeling also identified a combination

¹ Information on the Interstate Transport State Implementation Plan Submissions for the 2015 Ozone National Ambient Air Quality Standards under Clean Air Act Section 110(a)(2)(D)(i)(I). Memorandum from Peter Tsigotis, Direction, U.S.EPA Office of Air Quality Planning and Standards, to Regional Air Division Directors, Regions 1-10. March 27, 2018. Available at: https://www.epa.gov/sites/production/files/2018-03/documents/transport_memo_03_27_18_1.pdf. Pages 2-3.

² Ibid.

³ Ibid, page 4

of 43 nonattainment receptors and 6 maintenance receptors scattered across 13 counties of California.⁴ See Table E1 and Table E2.

Table E1. Nonattainment and Maintenance Receptors Outside of California.

| State | County | Site ID | Nonattainment | Maintenance |
|-------------|-----------|-----------|---------------|-------------|
| Arizona | Maricopa | 40130019 | | X |
| | Maricopa | 40131004 | | X |
| Colorado | Arapahoe | 80050002 | | X |
| | Douglas | 80350004 | X | |
| | Jefferson | 80590006 | X | |
| | Jefferson | 80590011 | | X |
| | Larimer | 80690011 | X | |
| | Weld | 81230009 | | X |
| Connecticut | Fairfield | 90010017 | | X |
| | Fairfield | 90013007 | X | |
| | Fairfield | 90019003 | X | |
| | New Haven | 90099002 | X | |
| Maryland | Harford | 240251001 | X | |
| Michigan | Allegan | 260050003 | | X |
| | Wayne | 261630019 | | X |
| New York | Queens | 360810124 | | X |
| | Richmond | 360850067 | X | |
| | Suffolk | 361030002 | X | |
| Texas | Brazoria | 480391004 | X | |
| | Denton | 481210034 | | X |
| | Harris | 482010024 | | X |
| | Harris | 48011034 | | X |
| | Harris | 482011039 | X | |
| | Tarrant | 484392003 | X | |
| Wisconsin | Milwaukee | 550790085 | | X |
| | Sheboygan | 551170006 | | X |

In summary, EPA's modeling has identified fifty-five 2023 nonattainment monitors, 43 in California and 12 in other states, and twenty 2023 maintenance monitors, 6 in California and 14 in other states. The following section identifies upwind states contributing to 2023 nonattainment and maintenance receptors.

E.3 IDENTIFICATION OF UPWIND CONTRIBUTING STATES

Step 2 of the CSAPR framework is identify upwind states that contribute enough to those downwind air quality problems to warrant further review and analysis. In this analysis, Nevada has used EPA contribution modeling to identify and quantify contributions greater than 0.5

⁴ Ibid, Attachment B.

percent of the 2015 ozone NAAQS resulting from Nevada’s anthropogenic emissions to: all receptors in Nevada, non-violating (attainment) receptors in other states, and nonattainment and maintenance receptors in other states. Although Nevada has analyzed contributions greater than 0.5 percent, neither EPA nor Nevada has identified a contribution threshold to define contribute enough to warrant further review and analysis for the 2015 ozone NAAQS.

Table E2. Nonattainment and Maintenance Receptors in California.

| County | Nonattainment | Maintenance |
|----------------|---------------|-------------|
| Fresno | 5 | -- |
| Imperial | 2 | -- |
| Kern | 5 | 1 |
| Kings | 1 | -- |
| Los Angeles | 7 | -- |
| Madera | 1 | -- |
| Merced | -- | 1 |
| Riverside | 9 | -- |
| Sacramento | 1 | 1 |
| San Bernardino | 9 | -- |
| Stanislaus | 1 | -- |
| Tulare | 2 | 2 |
| Ventura | -- | 1 |

E.3.1 Contribution Threshold

Although Nevada does not support its use in the western US, CSAPR used a screening threshold (1 percent of the NAAQS) to identify contributing upwind states warranting further review and analysis. States whose air quality impact (for ozone the impacts would include those from VOCs and NO_x and from all sectors) to at least one downwind problem receptor was greater than or equal to the threshold were identified as needing further evaluation for action to address transport. States whose air quality impacts to all downwind problem receptors were below this threshold were identified as states not requiring further evaluation for actions to address transport—that is, these states had no emissions reduction obligation under the “Good Neighbor” Provision.⁵

EPA recently released guidance on significant impact levels (SILs) for ozone, identified at 1.0 ppb, in the Prevention of Significant Deterioration (PSD) permitting program. The EPA believes that the application of this SIL in the manner described in the guidance would be sufficient in most situation for a permitting authority to conclude that a proposed source will not cause or contribute to a violation of an ozone NAAQS, while noting that the document is guidance and not a final determination. EPA also notes a permitting authority can reasonably conclude that

⁵ Information on the Interstate Transport “Good Neighbor” Provision for the 2008 Ozone NAAQS under the CAA Section 110(a)(2)(D)(i)(I). Memorandum from Steven D. Page, Director, Office of Air Quality Planning and Standards, to Regional Air Division Directors, Regions 1-10. January 22, 2015. Available at: <http://www.epa.gov/sites/production/files/2015-11/documents/goodneighborprovision2008naaqs.pdf>.

emission of a proposed sources that have a projected impact below the SIL are not the reason for, responsible for, or the “but for” cause of a NAAQS violation.⁶

Nevada believes the application of the CSAPR threshold to the western United States is a very conservative approach since interstate contributions in the West are relatively small, especially given the large contributions from background and intrastate emissions. The ozone SIL, as a compliance demonstration tool in the PSD program, provides further evidence that the CSAPR screening threshold is a conservative approach to identify contributing upwind states.

E.3.2 Reliance on U.S. EPA Contribution Modeling

Nevada’s transport analysis utilized EPA’s 2023 contribution modeling results to determine Nevada’s contributions to nonattainment and maintenance receptors in other states. Nevada has previously commented on EPA’s ozone NAAQS rulemaking, characterization of ozone background, modeling platforms, and implementation guidance, as well as supporting comments from the WESTAR Council. See Attachment A, Table E-A4.

Although models can always be refined and there may be differences in certain approaches to technical issues as Nevada has commented, it is NDEP’s position that the U.S.EPA’s modeling is state-of-the-science given U.S. EPA constraints. It is also NDEP’s position that U.S.EPA’s contribution modeling is the best available data with which to conduct Nevada’s transport analysis.

E.3.3 Contribution Analysis

EPA has identified 2023 nonattainment and maintenance receptors in three western states, Arizona, California, and Colorado based on observational data and modeling. Nevada has analyzed the contribution of 2023 base case anthropogenic NO_x and VOC emissions from sources within Nevada to projected 2023 ozone concentrations at each air quality receptor site. See Tables E-A1, E-A2, and E-A3 in Attachment A, which are based on *2015 Ozone NAAQS Interstate Transport Assessment Design Values and Contributions* (see page E-1).

These tables show:

- the monitor identifier;
- state and county of the monitor location;
- 2009-2013 average and maximum design values in parts per billion (ppb) based on observational data;
- 2023 modeled average and maximum design values in ppb (the monitor and model design values are used to determine which monitors are nonattainment and which are maintenance);

⁶ Guidance on Significant Impact Levels for Ozone and Fine Particles in the Prevention of Significant Deterioration Permitting Program. Memorandum from Peter Tsirigotis, Director, U.S. EPA Office of Air Quality Planning and Standards, to Regional Air Division Directors, Regions 1-10. April 17, 2018. Available at: <https://www.epa.gov/nsr/significant-impact-levels-ozone-and-fine-particles>.

- the percentage contribution (as percentage of the NAAQS) to 2023 design values resulting from Nevada's anthropogenic emissions (sorted from most to least contribution); and
- the intrastate (from within the state), interstate (from other states), and background contribution (the sum of contributions from Canada and Mexico, Offshore, Fire, Initial and Boundary Conditions, and Biogenic) in ppb and percentage of the NAAQS.

The contribution modeling reveals Nevada emissions contribute from approximately 1 to 15 percent to 2023 design values for monitors located in Nevada (Table E-A1), while contributing a maximum of 1.7 percent to 2023 design values for non-violating (attainment) monitors located outside of Nevada (Table E-A2). Nevada's largest contribution to a 2023 nonattainment or maintenance receptor located outside of Nevada is 0.9 percent (Table E-A3). Tables E-A2 and E-A3 show contributions to any nonattainment or maintenance receptor resulting from Nevada emissions greater than 0.5 percent of the 2015 ozone NAAQS.

Table E-A3 shows Nevada's contributions to nonattainment and maintenance receptors located outside the State greater than 0.5 percent. These contributions are limited to receptors located only in California and Colorado.

Nevada's contributions to 2023 nonattainment and maintenance receptors in California ranges from 0.5 to 0.9 percent, while intrastate contributions to these monitors ranges from 41 to 51 percent. Interstate contributions to these California monitors range from 1 to 2 percent, with background contributing from 49 to 65 percent. These data confirm that local California sources and background each contribute about half to these nonattainment and maintenance monitors with very little contribution resulting from the transport of out-of-state anthropogenic precursor emissions.

All but one of these California nonattainment and maintenance monitors, 60675003 in Sacramento County, are located in the San Joaquin Valley. The monitor in Sacramento is located in the Sacramento Metro area. Figure E-1 shows the location and classification of 2008 ozone nonattainment areas in California. The Sacramento Metro area is classified as a Severe-15 Nonattainment Area and the San Joaquin Valley is classified as an Extreme Nonattainment Area for the 2008 ozone NAAQS. Figure E-2 shows both of these areas are designated nonattainment for the 2015 ozone NAAQS, with the San Joaquin Valley classified as Extreme and the Sacramento Metro area classified as Moderate⁷.

⁷ *Nonattainment and Unclassifiable Area Designations for the 2015 Ozone Standards – April 30, 2018*. Available at: https://www.epa.gov/sites/production/files/2018-04/documents/placeholder_1.pdf

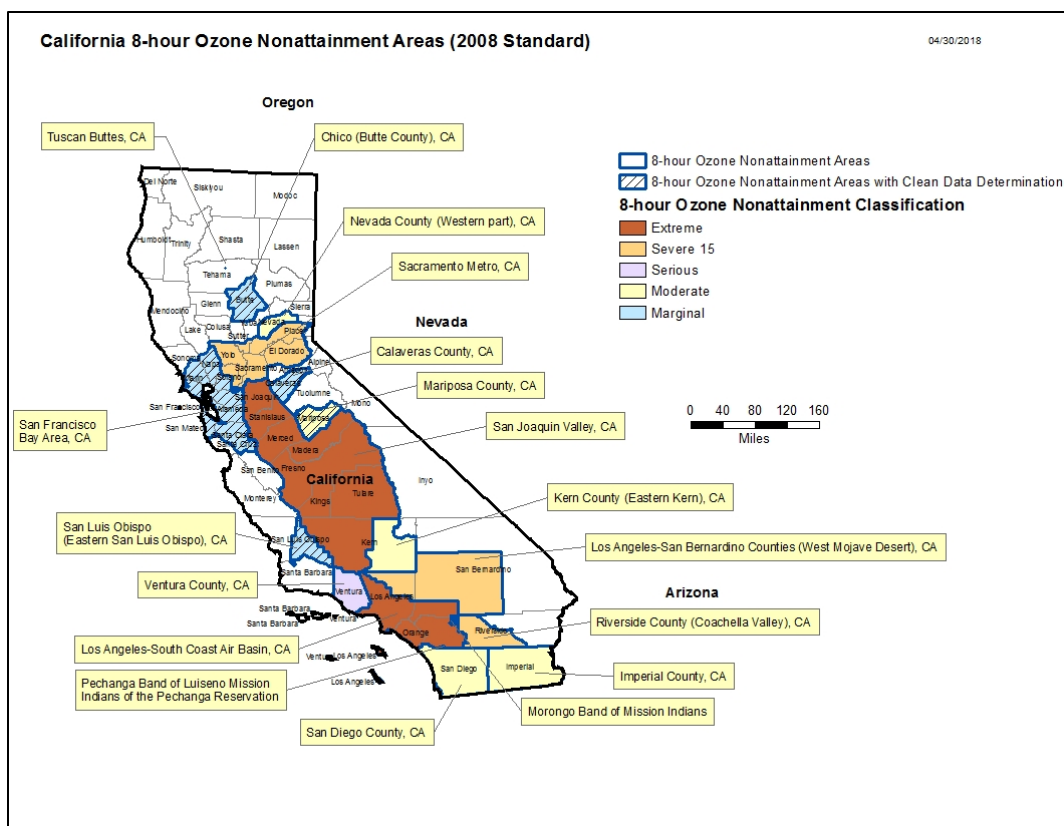


Figure E-1. 8-Hour Ozone (2008) California Nonattainment Area Map.

Available from: https://www3.epa.gov/airquality/greenbook/ca8_2008.html.

Nevada's contributions to 2023 nonattainment and maintenance receptors in Colorado is 0.5 percent, while intrastate contributions to these monitors ranges from 31 to 35 percent. Interstate contributions to these Colorado monitors range from 9 to 10 percent, with background contributing from 56 to 61 percent. These data show that local Colorado sources contribute roughly a third while background contributes from half to nearly two thirds to these nonattainment and maintenance monitors. However, interstate contributions, resulting from the transport of out-of-state anthropogenic precursor emissions, are nearly 10 percent, representing contributions greater than 0.1 percent from 17 (Larimer County receptor) to 21 (Jefferson County receptor) states. Notably, California, Utah, and Wyoming all contribute greater than 1 percent of the NAAQS to both of these Colorado receptors. Texas contributes greater than 1 percent only to the Jefferson County receptor. See Table E3.

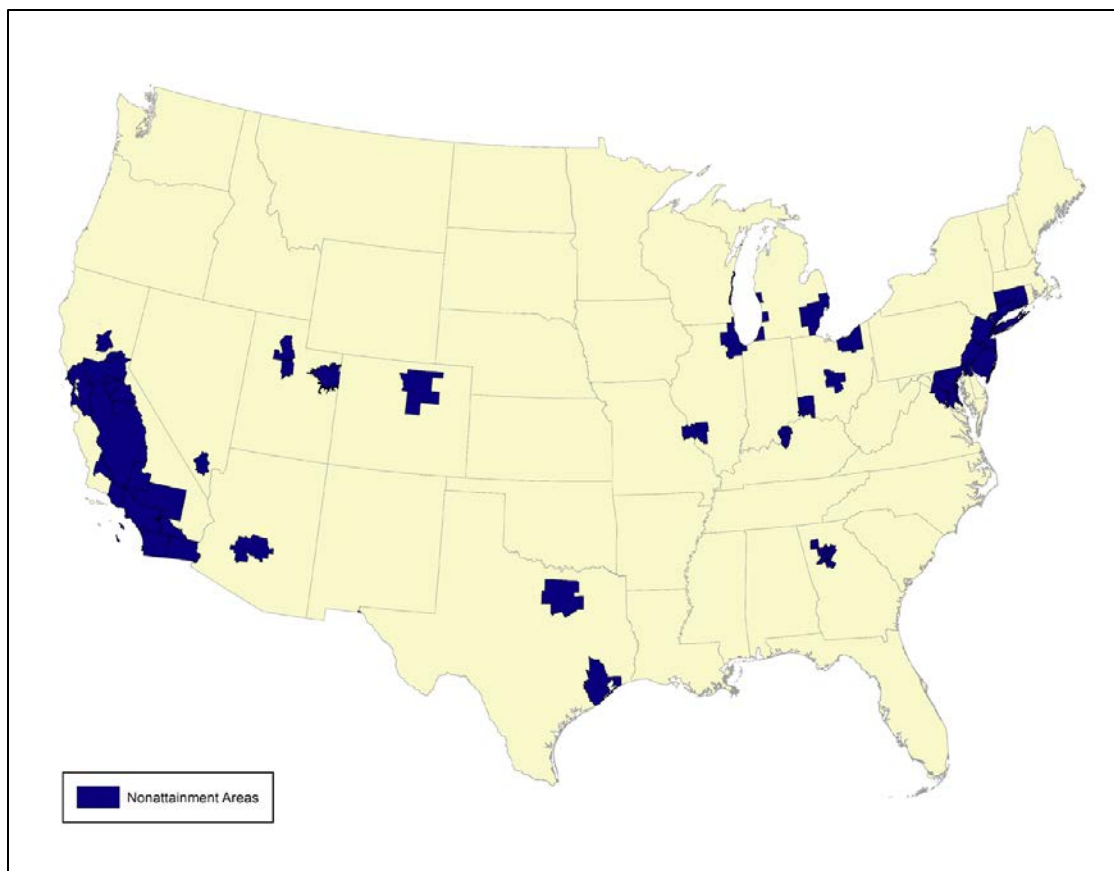


Figure E-2. Nonattainment Area Designations for the 2015 Ozone Standards
April 30, 2018.

Available at: https://www.epa.gov/sites/production/files/2018-04/documents/placeholder_3.pdf.

These Colorado monitors are located in the Denver-Boulder-Greeley-Ft. Collins-Loveland Moderate Nonattainment Area for the 2008 ozone NAAQS (Figure E-3) and Denver Metro/North Front Range Marginal Nonattainment Area for the 2015 ozone NAAQS⁸ (see Figure E-2).

⁸ Ibid.

Table E3. Interstate Contributions to Nonattainment and Maintenance Monitors in Colorado.

| | 80590011 | | 80690011 | | | 80590011 | | 80690011 | |
|-------|-----------|--------|----------|--------|--------|-----------|-------|----------|-------|
| | Jefferson | | Larimer | | | Jefferson | | Larimer | |
| State | ppb | % | ppb | % | State | ppb | % | ppb | % |
| AL | 0.01 | 0.01% | -- | -- | NC | -- | -- | -- | -- |
| AR | 0.02 | 0.03% | -- | -- | ND | -- | -- | -- | -- |
| AZ | 0.30 | 0.43% | 0.46 | 0.66% | NE | 0.36 | 0.51% | 0.25 | 0.36% |
| CA | 1.50 | 2.14% | 1.55 | 2.21% | NH | -- | -- | -- | -- |
| CO | 24.72 | 35.31% | 21.74 | 31.06% | NJ | -- | -- | -- | -- |
| CT | -- | -- | -- | -- | NM | 0.38 | 0.54% | 0.52 | 0.74% |
| DC | -- | -- | -- | -- | NV | 0.38 | 0.54% | 0.37 | 0.53% |
| DE | -- | -- | -- | -- | NY | -- | -- | -- | -- |
| FL | -- | -- | -- | -- | OH | -- | -- | -- | -- |
| GA | -- | -- | -- | -- | OK | 0.18 | 0.26% | 0.05 | 0.07% |
| IA | -- | -- | -- | -- | OR | 0.10 | 0.14% | 0.10 | 0.14% |
| ID | 0.12 | 0.17% | 0.13 | 0.19% | PA | -- | -- | -- | -- |
| IL | -- | -- | -- | -- | RI | -- | -- | -- | -- |
| IN | -- | -- | -- | -- | SC | -- | -- | -- | -- |
| KS | 0.32 | 0.46% | 0.10 | 0.14% | SD | 0.02 | 0.03% | 0.03 | 0.04% |
| KY | -- | -- | -- | -- | TN | -- | -- | -- | -- |
| LA | 0.04 | 0.06% | 0.02 | 0.03% | Tribal | 0.16 | 0.23% | 0.25 | 0.36% |
| MA | -- | -- | -- | -- | TX | 0.94 | 1.34% | 0.40 | 0.57% |
| MD | -- | -- | -- | -- | UT | 1.04 | 1.49% | 1.05 | 1.50% |
| ME | -- | -- | -- | -- | VA | -- | -- | -- | -- |
| MI | -- | -- | -- | -- | VT | -- | -- | -- | -- |
| MN | -- | -- | -- | -- | WA | 0.03 | 0.04% | 0.10 | 0.14% |
| MO | 0.02 | 0.03% | -- | -- | WI | -- | -- | -- | -- |
| MS | 0.01 | 0.01% | -- | -- | WV | -- | -- | -- | -- |
| MT | 0.02 | 0.03% | 0.07 | 0.10% | WY | 1.03 | 1.47% | 0.88 | 1.26% |

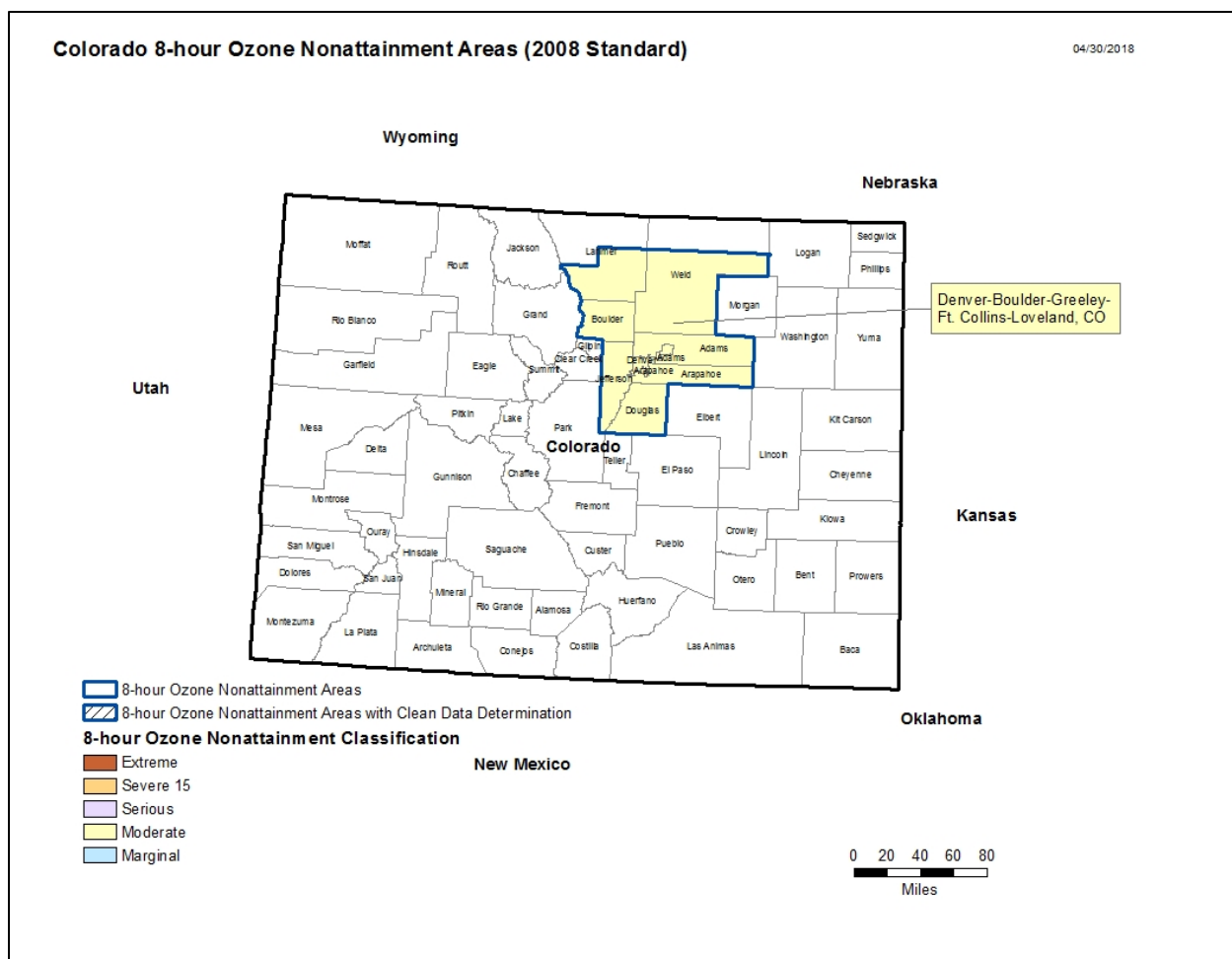


Figure E-3. 8-Hour Ozone (2008) California Nonattainment Area Map.

Available from: https://www3.epa.gov/airquality/greenbook/co8_2008.html.

In summary, the contribution of 2023 base case anthropogenic NO_x and VOC emissions from sources within Nevada to any projected 2023 nonattainment or maintenance receptor at greater than 0.5 percent of the NAAQS is limited to two states, California and Colorado. Nevada's contribution to these receptors is less than one percent of the 2015 ozone NAAQS. This section has addressed Step 2 of the CSAPR framework, identify upwind states that contribute enough to those downwind air quality problems to warrant further review and analysis.

The following section identifies the emissions reductions necessary (if any), considering cost and air quality factors, to prevent an identified upwind state from contributing significantly to those downwind air quality problems.

E.4 IDENTIFICATION OF NECESSARY EMISSIONS REDUCTIONS

Step 3 of the CSAPR framework is to identify the emissions reduction necessary (if any), considering cost and air quality factors, to prevent an identified upwind state from contributing significantly to those downwind air quality problems. EPA contribution modeling has quantified the contribution to nonattainment and maintenance receptors resulting from 2023 base case anthropogenic NO_x and VOC emissions from sources within Nevada to projected 2023 ozone concentrations at each air quality receptor site.

The analysis of Nevada's contributions above demonstrate that Nevada's emissions do not contribute significantly to any 2023 nonattainment or maintenance receptor for 2015 ozone NAAQS. Contributions to nonattainment and maintenance receptors where Nevada has the largest contributions (less than 1 percent of the NAAQS), intrastate and background contributions are sub-equal with maximum interstate contributions of approximately 2 percent. At the Colorado nonattainment and maintenance receptors the interstate contribution is nearly 10 percent but Nevada's contribution is just over 0.5 percent.

The EPA's quantification of the 2023 contributions resulting from Nevada's emissions to nonattainment and maintenance receptors documents that the emissions from Nevada do not contribute significantly to nonattainment areas, or interfere with maintenance, in any other state. Therefore, Nevada has determined the identification of emissions reductions necessary to prevent Nevada from contributing significantly to downwind air quality problems is moot.

E.5 CONCLUSION

In conclusion, no emissions reductions are needed from Nevada sources to prevent significant contributions to downwind air quality problems. Therefore, Nevada will not address Step 4 of the CSAPR framework, adopt permanent and enforceable measures needed to achieve those emissions reductions, as no emissions reductions are needed from Nevada based on analysis of all relevant information.

Attachment A

Table E-A1. Nevada's Contributions to 2023 Ozone Design Values for Monitors in Nevada.

| Site ID | State | County | 2009-2013 Avg DV | 2009-2013 Max DV | 2023 Avg DV | 2023 Max DV | Nevada Contributions as % of NAAQS | Intrastate Contributions | Intrastate Contributions as % of NAAQS | Interstate Contributions | Interstate Contributions as % of NAAQS | Background Contributions | Background Contributions as % of NAAQS |
|-----------|--------|-------------|---------------------|---------------------|----------------|----------------|---|-----------------------------|---|-----------------------------|---|-----------------------------|---|
| 320032002 | Nevada | Clark | 71.7 | 73.0 | 63.4 | 64.5 | 14.87% | 10.41 | 14.87% | 7.34 | 10.49% | 45.52 | 65.03% |
| 320030075 | Nevada | Clark | 76.0 | 77.0 | 67.4 | 68.3 | 14.09% | 9.86 | 14.09% | 7.60 | 10.86% | 49.81 | 71.16% |
| 320030071 | Nevada | Clark | 75.3 | 76.0 | 68.7 | 69.4 | 13.34% | 9.34 | 13.34% | 7.09 | 10.13% | 52.12 | 74.46% |
| 320030073 | Nevada | Clark | 74.7 | 76.0 | 68.2 | 69.4 | 13.24% | 9.27 | 13.24% | 7.05 | 10.07% | 51.73 | 73.90% |
| 320030043 | Nevada | Clark | 74.7 | 76.0 | 67.7 | 68.8 | 12.19% | 8.53 | 12.19% | 6.91 | 9.87% | 52.12 | 74.46% |
| 320030538 | Nevada | Clark | 71.0 | 72.0 | 62.9 | 63.8 | 12.19% | 8.53 | 12.19% | 7.61 | 10.87% | 46.63 | 66.61% |
| 320030540 | Nevada | Clark | 71.0 | 71.0 | 62.9 | 62.9 | 12.19% | 8.53 | 12.19% | 7.61 | 10.87% | 46.63 | 66.61% |
| 320190006 | Nevada | Lyon | 68.5 | 69.0 | 62.1 | 62.5 | 5.90% | 4.13 | 5.90% | 3.56 | 5.09% | 54.33 | 77.61% |
| 320311005 | Nevada | Washoe | 67.3 | 68.0 | 59.9 | 60.5 | 5.49% | 3.84 | 5.49% | 4.28 | 6.11% | 51.71 | 73.87% |
| 320030601 | Nevada | Clark | 72.0 | 72.0 | 65.7 | 65.7 | 3.21% | 2.25 | 3.21% | 7.37 | 10.53% | 55.93 | 79.90% |
| 320310020 | Nevada | Washoe | 67.0 | 68.0 | 60.1 | 61.0 | 3.04% | 2.13 | 3.04% | 3.83 | 5.47% | 54.08 | 77.26% |
| 320310016 | Nevada | Washoe | 66.0 | 67.0 | 59.2 | 60.1 | 3.00% | 2.10 | 3.00% | 3.77 | 5.39% | 53.26 | 76.09% |
| 320312009 | Nevada | Washoe | 67.0 | 68.0 | 60.1 | 61.0 | 2.89% | 2.02 | 2.89% | 4.18 | 5.97% | 53.84 | 76.91% |
| 320312002 | Nevada | Washoe | 61.7 | 62.0 | 55.2 | 55.5 | 1.96% | 1.37 | 1.96% | 5.45 | 7.79% | 48.30 | 69.00% |
| 320310025 | Nevada | Washoe | 66.3 | 67.0 | 60.0 | 60.6 | 1.57% | 1.10 | 1.57% | 3.72 | 5.31% | 55.12 | 78.74% |
| 325100002 | Nevada | Carson City | 66.0 | 66.0 | 60.2 | 60.2 | 1.53% | 1.07 | 1.53% | 3.90 | 5.57% | 55.15 | 78.79% |
| 320330101 | Nevada | White Pine | 72.0 | 74.0 | 65.8 | 67.7 | 1.50% | 1.05 | 1.50% | 4.74 | 6.77% | 59.86 | 85.51% |
| 320031019 | Nevada | Clark | 74.3 | 75.0 | 66.8 | 67.4 | 1.11% | 0.78 | 1.11% | 9.28 | 13.26% | 56.58 | 80.83% |

Table E-A2. Nevada's Contributions to 2023 Ozone Design Values for Attainment Monitors Outside of Nevada.

| Site ID | State | County | 2009-2013 Avg DV | 2009-2013 Max DV | 2023 Avg DV | 2023 Max DV | Nevada Contributions as % of NAAQS | Intrastate Contributions | Intrastate Contributions as % of NAAQS | Interstate Contributions | Interstate Contributions as % of NAAQS | Background Contributions | Background Contributions as % of NAAQS |
|-----------|------------|------------|---------------------|---------------------|----------------|----------------|---|-----------------------------|---|-----------------------------|---|-----------------------------|---|
| 490352004 | Utah | Salt Lake | 74.0 | 76.0 | 65.4 | 67.1 | 1.71% | 14.70 | 21.00% | 5.51 | 7.87% | 45.04 | 64.34% |
| 490530006 | Utah | Washington | 67.0 | 67.0 | 61.4 | 61.4 | 1.57% | 0.99 | 1.41% | 8.06 | 11.51% | 52.21 | 74.59% |
| 490353006 | Utah | Salt Lake | 76.0 | 76.0 | 65.8 | 65.8 | 1.56% | 11.23 | 16.04% | 5.94 | 8.49% | 48.49 | 69.27% |
| 490570002 | Utah | Weber | 71.7 | 72.0 | 64.0 | 64.3 | 1.39% | 10.07 | 14.39% | 4.90 | 7.00% | 48.90 | 69.86% |
| 490110004 | Utah | Davis | 69.3 | 71.0 | 60.0 | 61.5 | 1.31% | 11.17 | 15.96% | 4.48 | 6.40% | 44.21 | 63.16% |
| 490571003 | Utah | Weber | 72.7 | 74.0 | 65.3 | 66.5 | 1.20% | 8.80 | 12.57% | 4.85 | 6.93% | 51.50 | 73.57% |
| 490490002 | Utah | Utah | 70.0 | 73.0 | 62.7 | 65.4 | 1.16% | 4.59 | 6.56% | 5.49 | 7.84% | 52.50 | 75.00% |
| 490530130 | Utah | Washington | 71.7 | 73.0 | 65.8 | 67.0 | 0.97% | 0.63 | 0.90% | 7.96 | 11.37% | 57.06 | 81.51% |
| 60390004 | California | Madera | 79.3 | 81.0 | 68.6 | 70.1 | 0.80% | 27.63 | 39.47% | 1.27 | 1.81% | 39.59 | 56.56% |
| 490131001 | Utah | Duchesne | 68.0 | 68.0 | 62.0 | 62.0 | 0.80% | 1.50 | 2.14% | 4.22 | 6.03% | 56.12 | 80.17% |
| 490071003 | Utah | Carbon | 69.0 | 69.0 | 61.1 | 61.1 | 0.79% | 2.54 | 3.63% | 3.99 | 5.70% | 54.48 | 77.83% |
| 560370300 | Wyoming | Sweetwater | 66.0 | 66.0 | 60.0 | 60.0 | 0.79% | 1.77 | 2.53% | 6.50 | 9.29% | 51.58 | 73.69% |
| 60570005 | California | Nevada | 77.7 | 79.0 | 62.3 | 63.3 | 0.69% | 21.10 | 30.14% | 1.27 | 1.81% | 39.86 | 56.94% |
| 60570007 | California | Nevada | 76.0 | 78.0 | 60.7 | 62.3 | 0.60% | 21.41 | 30.59% | 1.25 | 1.79% | 37.97 | 54.24% |
| 60610004 | California | Placer | 74.0 | 75.0 | 58.9 | 59.7 | 0.57% | 23.36 | 33.37% | 1.18 | 1.69% | 34.30 | 49.00% |
| 490370101 | Utah | San Juan | 68.7 | 69.0 | 63.6 | 63.9 | 0.57% | 0.65 | 0.93% | 6.43 | 9.19% | 56.38 | 80.54% |
| 60610006 | California | Placer | 84.0 | 86.0 | 68.6 | 70.2 | 0.54% | 31.66 | 45.23% | 1.32 | 1.89% | 35.53 | 50.76% |
| 60670002 | California | Sacramento | 76.7 | 77.0 | 64.8 | 65.0 | 0.53% | 28.01 | 40.01% | 1.39 | 1.99% | 35.30 | 50.43% |
| 80013001 | Colorado | Adams | 76.0 | 76.0 | 70.8 | 70.8 | 0.51% | 24.78 | 35.40% | 6.84 | 9.77% | 38.99 | 55.70% |
| 80590002 | Colorado | Jefferson | 74.0 | 74.0 | 66.7 | 66.7 | 0.51% | 23.25 | 33.21% | 6.58 | 9.40% | 36.70 | 52.43% |

Table E-A3. Nevada's Contributions to 2023 Ozone Design Values for Nonattainment and Maintenance Monitors Outside of Nevada.

| Site ID | State | County | 2009-2013 Avg DV | 2009-2013 Max DV | 2023 Avg DV | 2023 Max DV | Nevada Contributions as % of NAAQS | Instate Contributions | Intrastate Contributions as % of NAAQS | Interstate Contributions | Interstate Contributions as % of NAAQS | Background Contributions | Background Contributions as % of NAAQS |
|----------|------------|------------|---------------------|---------------------|----------------|----------------|---|--------------------------|---|-----------------------------|---|-----------------------------|---|
| 60392010 | California | Madera | 85.0 | 86.0 | 72.1 | 72.9 | 0.93% | 28.39 | 40.56% | 1.44 | 2.06% | 42.17 | 60.24% |
| 60190242 | California | Fresno | 91.7 | 95.0 | 79.4 | 82.2 | 0.91% | 31.98 | 45.69% | 1.47 | 2.10% | 45.83 | 65.47% |
| 60296001 | California | Kern | 84.3 | 86.0 | 70.9 | 72.4 | 0.83% | 28.50 | 40.71% | 1.07 | 1.53% | 41.25 | 58.93% |
| 60190007 | California | Fresno | 94.7 | 95.0 | 79.2 | 79.4 | 0.73% | 35.68 | 50.97% | 1.17 | 1.67% | 42.24 | 60.34% |
| 60190011 | California | Fresno | 93.0 | 96.0 | 78.6 | 81.2 | 0.63% | 35.20 | 50.29% | 1.10 | 1.57% | 42.20 | 60.29% |
| 60675003 | California | Sacramento | 86.3 | 88.0 | 69.9 | 71.3 | 0.63% | 34.18 | 48.83% | 1.03 | 1.47% | 34.62 | 49.46% |
| 60470003 | California | Merced | 82.7 | 84.0 | 69.9 | 71.0 | 0.56% | 28.52 | 40.74% | 0.98 | 1.40% | 40.32 | 57.60% |
| 60195001 | California | Fresno | 97.0 | 99.0 | 79.6 | 81.2 | 0.54% | 35.79 | 51.13% | 0.88 | 1.26% | 42.83 | 61.19% |
| 60290014 | California | Kern | 87.7 | 89.0 | 74.1 | 75.2 | 0.54% | 31.54 | 45.06% | 0.94 | 1.34% | 41.52 | 59.31% |
| 80590011 | Colorado | Jefferson | 78.7 | 82.0 | 70.9 | 73.9 | 0.54% | 24.72 | 35.31% | 6.98 | 9.97% | 39.01 | 55.73% |
| 80690011 | Colorado | Larimer | 78.0 | 80.0 | 71.2 | 73.0 | 0.53% | 21.74 | 31.06% | 6.33 | 9.04% | 42.96 | 61.37% |

Table E-A4. Summary of NDEP Comment Letters Applicable to Ozone NAAQS, 2014-2017.

| Federal Register Notice | Rule Description | Subject | Docket and Document ID (link to comments) |
|-------------------------|--|---|--|
| 2017 | | | |
| 81 FR 391894 | Implementation of the 2015 National Ambient Air Quality Standards for Ozone: Nonattainment Area Classifications and State Implementation Plan Requirements | 2/9/2017 NDEP comments on EPA's Implementation of the 2015 National Ambient Air Quality Standards for Ozone: Nonattainment Area Classifications and State Implementation Plan Requirements | EPA-HQ-OAR-2016-0202-0069 |
| 81 FR 391894 | Implementation of the 2015 National Ambient Air Quality Standards for Ozone: Nonattainment Area Classifications and State Implementation Plan Requirements | 2/13/2017 WESTAR comments on EPA's Implementation of the 2015 National Ambient Air Quality Standards for Ozone: Nonattainment Area Classifications and State Implementation Plan Requirements | EPA-HQ-OAR-2016-0202-0080 |
| 2016 | | | |
| NA | Modeling Guidance for Demonstrating Attainment of Air Quality Goals for Ozone, PM2.5 & Regional Haze | 3/12/2016 NDEP comments on Modeling Guidance for Demonstrating Attainment of Air Quality Goals for Ozone, PM2.5 & Regional Haze | submitted to Brian Timin, USEPA, AQMG |
| NA | Implementation of the 2015 Primary Ozone NAAQS: Issues Associated with Background Ozone | 5/11/2016 WESTAR comments on EPA's Implementation of the 2015 Primary Ozone NAAQS: Issues Associated with Background Ozone White Paper for Discussion | EPA-HQ-OAR-2016-0097-0034 |

Table E-A4. Summary of NDEP Comment Letters Applicable to Ozone NAAQS, 2014-2017 (continued).

| Federal Register Notice | Rule Description | Subject | Docket and Document ID (link to comments) |
|-------------------------|---|--|--|
| 2015 | | | |
| 79 FR 75234 | National Ambient Air Quality Standards for Ozone | 3/12/2015 NDEP comments on National Ambient Air Quality Standards for Ozone | EPA-HQ-OAR-2008-0699-1741 |
| 79 FR 75234 | National Ambient Air Quality Standards for Ozone | 3/16/2015 WESTAR comments on National Ambient Air Quality Standards for Ozone | EPA-HQ-OAR-2008-0699-1990 |
| 80 FR 45340 | Revisions to the Guideline on Air Quality Models: Enhancement to the AERMOD Dispersion Modeling System and Incorporation of Approaches to Address Ozone and Fine Particulate Matter | 10/16/2015 NDEP comments on USEPA's Proposed Rule Regarding AERMOD | EPA-HQ-OAR-2015-0310-0080 |
| 2014 | | | |
| 78 FR 70935 | Notice of Availability of the Environmental Protection Agency's 2011 Emissions Modeling Platform | 3/31/2014 NDEP comments on EPA's 2011 NEI emissions modeling platform (for use in ozone transport modeling and more) | EPA-HQ-OAR-2013-0743-0047 |
| 78 FR 70935 | Notice of Availability of the Environmental Protection Agency's 2011 Emissions Modeling Platform | 4/9/2014 WESTAR comments on EPA's 2011 and 2018 Modeling Platforms | Comment Letter |
| 79 FR 6330 | Standards of Performance for New Residential Wood Heaters, New Residential Hydronic Heaters and Forced-Air Furnaces, and New Residential Masonry Heaters | 5/1/2014 WESTAR comments on Standards of Performance for New Residential Wood Heaters, New Residential Hydronic Heaters and Forced-Air Furnaces, and New Residential Masonry Heaters | EPA-HQ-OAR-2009-0734-1423 |
| 78 FR 70935 | Notice of Availability of the Environmental Protection Agency's 2011 Emissions Modeling Platform | 6/11/2014 WESTAR comments on EPA's | Comment Letter |



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Order End Date: 07/23/2018

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| 06-20-18, 07-12-18, 07-23-18, REN-rgj.com | 3 | 06/20/2018 | 07/23/2018 |
| 06-20-18, 07-12-18, 07-23-18, | | | |

* ALL TRANSACTIONS CONSIDERED PAID IN FULL UPON CLEARANCE OF FINANCIAL INSTITUTION

Text of Ad: 06/18/2018

NOTICE OF PUBLIC HEARING
WASHOE COUNTY DISTRICT BOARD OF HEALTH

The Washoe County District Board of Health does hereby declare 1:00 p.m., Thursday, July 26, 2018, at the Board of County Commissioners Chambers, located at 1001 East 9th Street, Building A, Reno, Nevada as the time, date, and place to consider the adoption of an Infrastructure State Implementation Plan (I-SIP) for the 2015 Ozone National Ambient Air Quality Standard for submittal to the U.S. EPA as a revision to the Washoe County portion of the Nevada SIP.

Interested persons who may be affected or wish to comment on any action being considered on the above date should appear at the public hearing to submit oral testimony or may address comments, data, views, or arguments in written form prior to the hearing to the Washoe County District Board of Health, P.O. Box 11130, Reno, NV 89520. Copies of the I-SIP are available at the Air Quality Management Division website (OurCleanAir.com) and offices (1001 East 9th, Suite B171, Reno, Nevada 89512) for inspection by any interested person.

Kitty Jung, Chair
Washoe County District Board of Health

No 2987658

June 20; July 12 & 23, 2018

**PROOF OF
PUBLICATION**

**STATE OF WISCONSIN SS.
COUNTY OF BROWN**

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Being first duly sworn, deposes and says: That as the legal clerk of the Reno Gazette-Journal, a daily newspaper of general circulation published in Reno, Washoe County, State of Nevada, that the notice referenced below has published in each regular and entire issue of said newspaper between the date: 06/20/2018 - 07/23/2018, for exact publication dates please see last line of Proof of Publication below.

**NOTICE OF PUBLIC HEARING
WASHOE COUNTY DISTRICT BOARD OF HEALTH**

The Washoe County District Board of Health does hereby declare 1:00 p.m., Thursday, July 26, 2018, at the Board of County Commissioners Chambers, located at 1001 East 9th Street, Building A, Reno, Nevada as the time, date, and place to consider the adoption of an Infrastructure State Implementation Plan (I-SIP) for the 2015 Ozone National Ambient Air Quality Standard for submittal to the U.S. EPA as a revision to the Washoe County portion of the Nevada SIP.

Interested persons who may be affected or wish to comment on any action being considered on the above date should appear at the public hearing to submit oral testimony or may address comments, data, views, or arguments in written form prior to the hearing to the Washoe County District Board of Health, P.O. Box 11130, Reno, NV 89520. Copies of the I-SIP are available at the Air Quality Management Division website (OurCleanAir.com) and offices (1001 East 9th, Suite B171, Reno, Nevada 89512) for inspection by any interested person.

Kitty Jung, Chair
Washoe County District Board of Health


No 2987658

June 20; July 12 & 23, 2018

06/20/18, 07/12/18, 07/23/18


Legal Clerk

Subscribed and sworn before me this
23th of August 2018.


NOTARY PUBLIC RESIDING
AT STATE OF WISCONSIN
COUNTY OF BROWN

Notary Expires: 3/20/2022



Ad#:0002987658

P O : Air Quality Management Public Notice

of Affidavits: 000

Washoe County District Board of Health Meeting Notice and Agenda

Members

Kitty Jung, Chair
Dr. John Novak, Vice Chair
Oscar Delgado
Dr. George Hess
Kristopher Dahir
Michael D. Brown
Tom Young

**Thursday, July 26, 2018
1:00 p.m.**

**Washoe County Administration Complex
Commission Chambers, Building A
1001 East Ninth Street
Reno, NV**

PUBLIC HEARING ITEM SCHEDULED ON THIS AGENDA **(Complete item description on third page.)**

**An item listed with asterisk (*) next to it is an item for which no action will be taken.
1:00 p.m.**

1. *Roll Call and Determination of Quorum

2. *Pledge of Allegiance

3. *Public Comment

Any person is invited to speak on any item on or off the agenda during this period. Action may not be taken on any matter raised during this public comment period until the matter is specifically listed on an agenda as an action item.

4. Approval of Agenda – (For possible action)

July 26, 2018

5. *Recognitions

A. Years of Service

- i. Molly Diaz, 15 years, Hired 7/28/2003 - AHS
- ii. Will Lumpkin, 10 years, Hired 7/21/2008 - EHS

B. New Hires

- i. Katherine Sullivan, Office Assistant II, 7/9/2018 - EHS
- ii. Kelly Parsons, Office Assistant II, 7/23/2018 - AQM

C. Reassignments

- i. Jessica Cabrales, from CCHS Office Support Specialist to Office Support Specialist, 7/9/2018, - AQM

D. Resignations

- i. Jan Houk, 7/27/2018, Public Health Nurse II, 22 years, CCHS
- ii. Ruth Soto-Castillo, 6/23/2018, Community Health Aide, 12 years, CCHS

- E. Shining Star
 - i. Carmen Mendoza - EPHP

6. Consent Items – (For possible action)

Matters which the District Board of Health may consider in one motion. Any exceptions to the Consent Agenda must be stated prior to approval.

A. Approval of Draft Minutes – (For possible action)

- i. June 28, 2018

B. Budget Amendments/Interlocal Agreements – (For possible action)

- i. Retroactively approve a Subgrant Award from the Nevada Department of Health and Human Services, Division of Public and Behavioral Health, for the period of August 1, 2017 through July 31, 2018 [From \$170,522 to \$312,866] in support of the Centers for Disease Control and Prevention (CDC) Epidemiology and Laboratory Capacity Program IO #10984 and authorize the District Health Officer to execute the Subgrant Award.

Staff Representative: Jennifer Pierce

- C. Approve an Interlocal Agreement between Washoe County Health District and University of Nevada, Reno School of Medicine Integrated Clinical Services, Inc., and University of Nevada, Reno School of Medicine MultiSpecialty Group Practice North, Inc., dba MEDSchool Associates North, to designate faculty member(s) to serve as Medical Consultant to the District for the Sexually Transmitted Disease Clinic retroactive to July 1, 2018 through June 30, 2019 unless extended by the mutual agreement of the Parties, with automatic renewal for two successive one-year periods for a total of three years for the terms in the agreement unless either party gives the other written notice of nonrenewal at least 60 days prior to June 30 of each year. – (For possible action)

Staff Representative: Nancy Kerns Cummins

- D. Approve Amendment #1 to the Interlocal Agreement between the Washoe County Health District and Washoe County through its Department of Juvenile Services to provide for vaccine storage retroactive to July 1, 2018. – (For possible action)

Staff Representative: Nancy Kerns Cummins

- E. Presentation, discussion, and possible approval of the donation of various pieces of obsolete monitoring equipment and associated supplies with a current market value estimated at \$-0- that have exceeded the useful value for regulatory purposes but may still have value for educational, research and community organizations. - (For possible action)

Staff Representative: Charlene Albee

- F. Recommendation to Uphold Citations Not Appealed to the Air Pollution Control Hearing Board. - (For possible action)

- i. Olympia Gaming CRS Sparks – Case No. 1200, NOV No. 5665
- ii. Woodsprings Suites Reno East Legends – Case No. 1201, NOV No. 5668

Staff Representative: Charlene Albee

- G. Acknowledge receipt of the Health Fund Financial Review for June, Fiscal Year 2018 – (For possible action)

Staff Representative: Anna Heenan

- 7. PUBLIC HEARING: Presentation, discussion, and possible adoption of “The Washoe County Portion of the Nevada State Implementation Plan to Meet the Ozone Infrastructure SIP Requirements of Clean Air Act Section 110(a)(2)” and direct Staff to forward it to EPA via NDEP as an amendment to the Washoe County portion of the Nevada Ozone State Implementation Plan. - (For possible action)**

Staff Representative: Charlene Albee

- 8. Regional Emergency Medical Services Authority**

Presented by: JW Hodge

A. Review and Acceptance of the REMSA Operations Report for June, 2018 – (For possible action)

B. *Update of REMSA’s Public Relations during June 2018

- 9. Consideration and possible adoption of a policy for Environmental Health Services (EHS) and Air Quality Management fee relief or mitigation for entities affected by disasters and emergencies. - (For possible action)**

Staff Representative: Kevin Dick

- 10. *Staff Reports and Program Updates**

A. Air Quality Management, Charlene Albee, Director

Program Update, Divisional Update, Program Reports

B. Community and Clinical Health Services, Steve Kutz, Director

Divisional Update – Changes to CCHS Programs; Medicaid Enrollment Assistance; Data & Metrics; Program Reports

C. Environmental Health Services, Chad Westom, Director

Environmental Health Services (EHS) Division and Program Updates – Community Development, Food, Special Events, Land Development, Safe Drinking Water, Vector-Borne Diseases, Waste Management, Inspections

D. Epidemiology and Public Health Preparedness, Dr. Randall Todd, Director

Program Updates for Communicable Disease, Public Health Preparedness, and Emergency Medical Services

E. Office of the District Health Officer, Kevin Dick, District Health Officer

District Health Officer Report – REMSA Franchise Agreement, Plan Reviews, Washoe Behavioral Health Policy Board, Public Health Accreditation, Community Health Improvement Plan, Truckee Meadows Healthy Communities, Quality Improvement, Workforce Development, Style Guide, New CCHS Fees, Other Events and Activities and Health District Media Contacts.

- 11. *Board Comment**

Limited to announcements or issues for future agendas.

- 12. *Public Comment**

Any person is invited to speak on any item on or off the agenda during this period. Action may not be taken on any matter raised during this public comment period until the matter is specifically listed on an agenda as an action item.

- 13. Adjournment – (For possible action)**

Possible Changes to Agenda Order and Timing: Items on the agenda may be taken out of order, combined with other items, withdrawn from the agenda, moved to the agenda of another later meeting; moved to or from the Consent section, or they may be voted on in a block. Items with a specific time designation will not be heard prior to the stated time, but may be heard later. Items listed in the Consent section of the agenda are voted on as a block and will not be read or considered separately unless withdrawn from the Consent agenda.

Special Accommodations: The District Board of Health Meetings are accessible to the disabled. Disabled members of the public who require special accommodations or assistance at the meeting are requested to notify Administrative Health Services in writing at the Washoe County Health District, PO Box 1130, Reno, NV 89520-0027, or by calling 775.328.2416, 24 hours prior to the meeting.

Public Comment: During the “Public Comment” items, anyone may speak pertaining to any matter either on or off the agenda, to include items to be heard on consent. For the remainder of the agenda, public comment will only be heard during items that are not marked with an asterisk (*). Any public comment for hearing items will be heard before action is taken on the item and must be about the specific item being considered by the Board. In order to speak during any public comment, each speaker must fill out a “Request to Speak” form and/or submit comments for the record to the Recording Secretary. Public comment and presentations for individual agenda items are limited as follows: fifteen minutes each for staff and applicant presentations, five minutes for a speaker representing a group, and three minutes for individual speakers unless extended by questions from the Board or by action of the Chair.

Response to Public Comment: The Board of Health can deliberate or take action only if a matter has been listed on an agenda properly posted prior to the meeting. During the public comment period, speakers may address matters listed or not listed on the published agenda. The *Open Meeting Law* does not expressly prohibit responses to public comments by the Board of Health. However, responses from the Board members to unlisted public comment topics could become deliberation on a matter without notice to the public. On the advice of legal counsel and to ensure the public has notice of all matters the Board of Health will consider, Board members may choose not to respond to public comments, except to correct factual inaccuracies, ask for Health District Staff action or to ask that a matter be listed on a future agenda. The Board of Health may do this either during the public comment item or during the following item: “Board Comments – Limited to Announcement or Issues for future Agendas.”

Posting of Agenda; Location of Website:

Pursuant to NRS 241.020, Notice of this meeting was posted at the following locations:

Washoe County Health District, 1001 E. 9th St., Reno, NV
Reno City Hall, 1 E. 1st St., Reno, NV
Sparks City Hall, 431 Prater Way, Sparks, NV
Washoe County Administration Building, 1001 E. 9th St, Reno, NV
Downtown Reno Library, 301 S. Center St., Reno, NV
Washoe County Health District Website www.washoecounty.us/health
State of Nevada Website: <https://notice.nv.gov>

How to Get Copies of Agenda and Support Materials: Supporting materials are available to the public at the Washoe County Health District located at 1001 E. 9th Street, in Reno, Nevada. Ms. Laura Rogers, Administrative Secretary to the District Board of Health is the person designated by the Washoe County District Board of Health to respond to requests for supporting materials. Ms. Rogers is located at the Washoe County Health District and may be reached by telephone at (775) 328-2415 or by email at lrogers@washoecounty.us. Supporting materials are also available at the Washoe County Health District Website www.washoecounty.us/health pursuant to the requirements of NRS 241.020.

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STAFF REPORT
BOARD MEETING DATE: July 26, 2018

TO: District Board of Health

FROM: Daniel Inouye, Branch Chief
(775) 784-7214, dinouye@washoecounty.us

THROUGH: Charlene Albee, Director
(775) 784-7211, calbee@washoecounty.us

SUBJECT: Presentation, discussion, and possible adoption of “The Washoe County Portion of the Nevada State Implementation Plan to Meet the Ozone Infrastructure SIP Requirements of Clean Air Act Section 110(a)(2)” and direct Staff to forward it to EPA via NDEP as an amendment to the Washoe County portion of the Nevada Ozone State Implementation Plan.

SUMMARY

The Clean Air Act (CAA) requires state and local air quality management agencies to demonstrate the ability to implement, maintain, and enforce National Ambient Air Quality Standards (NAAQS). This Infrastructure State Implementation Plan (I-SIP) is the formal plan demonstrating that the Washoe County Health District, Air Quality Management Division can meet those requirements.

Health District Strategic Priority supported by this item: Healthy Environment – Create a healthier environment that allows people to safely enjoy everything Washoe County has to offer.

PREVIOUS ACTION

Feb 28, 2013 The DBOH adopted the “Washoe County Portion of the Nevada Ozone Infrastructure State Implementation Plan for the 2008 Ozone NAAQS: Demonstration of Adequacy”.

Various Dates The DBOH has also adopted similar I-SIP’s to address revisions to the PM_{2.5}, SO₂, and NO₂ NAAQS.

BACKGROUND

The U.S. Environmental Protection Agency (EPA) establishes health based national ambient air quality standards (NAAQS) for six criteria pollutants including ozone. The CAA directs states to address basic State Implementation Plan (SIP) requirements to implement, maintain, and enforce the NAAQS. Many of the CAA Section 110(a)(2) SIP elements relate to the general

information and authorities that constitute the “infrastructure” of a state’s air quality management program. States are required to submit an Infrastructure SIP (I-SIP) within three years after promulgation of a new or revised standard. In 2015, EPA strengthened the ozone NAAQS from 0.075 to 0.070 ppm averaged over 8-hours.

This I-SIP was prepared in coordination with the Nevada Division of Environmental Protection (NDEP) and Clark County Department of Air Quality.

The first notice of the July 26, 2018 public hearing was published in the Reno Gazette-Journal on June 20, 2018. The I-SIP has been available for public inspection at the AQMD website (OurCleanAir.com) and office since June 20, 2018.

FISCAL IMPACT

There is no additional fiscal impact to the FY 2018-19 budget should the DBOH adopt this I-SIP.

RECOMMENDATION

Staff recommends that the DBOH adopt “The Washoe County Portion of the Nevada State Implementation Plan to Meet the Ozone Infrastructure SIP Requirements of Clean Air Act Section 110(a)(2)” and direct Staff to forward it to EPA via NDEP as an amendment to the Washoe County portion of the Nevada Ozone State Implementation Plan.

POSSIBLE MOTION

Should the Board concur with Staff’s recommendation, a possible motion would be:

“Move to adopt “The Washoe County Portion of the Nevada State Implementation Plan to Meet the Ozone Infrastructure SIP Requirements of Clean Air Act Section 110(a)(2)” and direct Staff to forward it to EPA via NDEP as an amendment to the Washoe County portion of the Nevada Ozone State Implementation Plan.”

Washoe County District Board of Health Meeting Minutes

Members

Kitty Jung, Chair
Dr. John Novak, Vice Chair
Oscar Delgado
Dr. George Hess
Kristopher Dahir
Michael D. Brown
Tom Young

**Thursday, July 26, 2018
1:00 p.m.**

**Washoe County Administration Complex
Commission Chambers, Building A
1001 East Ninth Street
Reno, NV**

1. *Roll Call and Determination of Quorum

Vice Chair Novak called the meeting to order at 1:01 p.m.

The following members and staff were present:

Members present: Dr. John Novak, Vice Chair

Michael Brown
Dr. George Hess
Oscar Delgado

Members absent: Kitty Jung, Chair

Tom Young
Kristopher Dahir

Ms. Rogers verified a quorum was present.

Staff present: Kevin Dick, District Health Officer, ODHO
Leslie Admirand, Deputy District Attorney
Daniel Inouye
Steve Kutz
Chad Westom
Christina Conti
Julie Hunter

2. *Pledge of Allegiance

Dr. Hess led the pledge to the flag.

3. *Public Comment

As there was no one wishing to speak, Vice Chair Novak closed the public comment period.

4. Approval of Agenda

July 26, 2018

Mr. Brown moved to approve the agenda for the July 26, 2018, District Board of Health regular meeting. Mr. Delgado seconded the motion which was approved four in favor and none against.

5. Recognitions

A. Years of Service

- i. Molly Diaz, 15 years, Hired 7/28/2003 - AHS

Mr. Dick congratulated Ms. Diaz on her fifteen years of service.

- ii. Will Lumpkin, 10 years, Hired 7/21/2008 - EHS

Although Mr. Lumpkin was not in attendance to be recognized, Mr. Dick explained that he is member of the Vector Control Program and congratulated him on his ten years of service.

B. New Hires

- i. Katherine Sullivan, Office Assistant II, 7/9/2018 - EHS

Mr. Westom introduced Ms. Sullivan, informing that she is an asset to Environmental Health Services and is coming up to speed very quickly.

- ii. Kelly Parsons, Office Assistant II, 7/23/2018 – AQM

Mr. Inouye introduced Ms. Parsons as Air Quality Management's new Office Assistant II. He informed that she is originally from California, but graduated from Reed High School after moving to the area and earned her Bachelor of Science in Business Management from UNR.

Mr. Inouye stated that, of the nineteen employees in AQM, fourteen were UNR graduates and that number includes four employees with advanced degrees.

Mr. Inouye stated that Ms. Parsons began her career with Washoe County in 2015 with Human Services and Child Protective Services. He expressed that AQM is very pleased to have Ms. Parsons on staff with them.

C. Reassignments

- i. Jessica Cabrales, from CCHS Office Support Specialist to Office Support Specialist, 7/9/2018, - AQM

Mr. Dick informed that Ms. Cabrales had been reassigned within the Health District from CCHS to AQM as an Office Support Specialist and congratulated her on her new position.

D. Resignations

- i. Jan Houk, 7/27/2018, Public Health Nurse II, 22 years, CCHS

Mr. Dick stated that Ms. Houk had twenty-two years with the Health District and had resigned to work full time with the Washoe County School District as a School Nurse, but was pleased to inform that she would continue working with the Health District as an intermittent hourly employee.

Ms. Houk was not able to be in attendance.

- ii. Ruth Soto-Castillo, 6/23/2018, Community Health Aide, 12 years, CCHS

Mr. Dick informed that Ms. Soto-Castillo had worked twelve years with the Health District. Ms. Soto-Castillo was not in attendance.

- E. Shining Star
 - i. Carmen Mendoza - EPHP

Mr. Dick reminded the Board that the Shining Star Awards are to recognize exceptional customer service or performance in the Health District, and that nominations can come from either external customers or staff. He wished to recognize Ms. Mendoza once again, informing that she had nine nominations at the time her recognition was placed on the agenda but that she has now received her tenth Shining Star Award.

Mr. Dick explained that Ms. Mendoza is in the Vital Records Program, which historically because of restrictions on who can be issued the records, had dissatisfied customers due to interactions there. Mr. Dick expressed he was very pleased with the performance of Ms. Mendoza and her staff who have received these Shining Star recognitions.

6. Consent Items

Matters which the District Board of Health may consider in one motion. Any exceptions to the Consent Agenda must be stated prior to approval.

- A. Approval of Draft Minutes
 - i. June 28, 2018

- B. Budget Amendments/Interlocal Agreements

- i. Retroactively approve a Subgrant Award from the Nevada Department of Health and Human Services, Division of Public and Behavioral Health, for the period of August 1, 2017 through July 31, 2018 [From \$170,522 to \$312,866] in support of the Centers for Disease Control and Prevention (CDC) Epidemiology and Laboratory Capacity Program IO #10984 and authorize the District Health Officer to execute the Subgrant Award.

Staff Representative: Jennifer Pierce

- C. Approve an Interlocal Agreement between Washoe County Health District and University of Nevada, Reno School of Medicine Integrated Clinical Services, Inc., and University of Nevada, Reno School of Medicine MultiSpecialty Group Practice North, Inc., dba MEDSchool Associates North, to designate faculty member(s) to serve as Medical Consultant to the District for the Sexually Transmitted Disease Clinic retroactive to July 1, 2018 through June 30, 2019 unless extended by the mutual agreement of the Parties, with automatic renewal for two successive one-year periods for a total of three years for the terms in the agreement unless either party gives the other written notice of nonrenewal at least 60 days prior to June 30 of each year.

Staff Representative: Nancy Kerns Cummins

- D. Approve Amendment #1 to the Interlocal Agreement between the Washoe County Health District and Washoe County through its Department of Juvenile Services to provide for vaccine storage retroactive to July 1, 2018.

Staff Representative: Nancy Kerns Cummins

- E. Presentation, discussion, and possible approval of the donation of various pieces of obsolete monitoring equipment and associated supplies with a current market value estimated at \$-0- that have exceeded the useful value for regulatory purposes but may still have value for educational, research and community organizations.

Staff Representative: Daniel Inouye

- F. Recommendation to Uphold Citations Not Appealed to the Air Pollution Control Hearing Board.
- i. Olympia Gaming CRS Sparks – Case No. 1200, NOV No. 5665
 - ii. Woodsprings Suites Reno East Legends – Case No. 1201, NOV No. 5668
- Staff Representative: Daniel Inouye
- G. Acknowledge receipt of the Health Fund Financial Review for June, Fiscal Year 2018
Staff Representative: Anna Heenan

Vice Chair Novak inquired regarding the amounts of the Air Quality Management fines on item 6F and requested they be reviewed for possible increase. He opined that the low penalty amount could encourage noncompliance as it would be more cost effective to pay the fine than comply.

Mr. Dick informed that these fines were for violations that occurred just prior to the higher fines for these violations approved at the June District Board of Health Meeting.

Dr. Hess moved to accept the Consent Agenda. Mr. Delgado seconded the motion which was approved four in favor and none against.

- 7. PUBLIC HEARING: Presentation, discussion, and possible adoption of “The Washoe County Portion of the Nevada State Implementation Plan to Meet the Ozone Infrastructure SIP Requirements of Clean Air Act Section 110(a)(2)” and direct Staff to forward it to EPA via NDEP as an amendment to the Washoe County portion of the Nevada Ozone State Implementation Plan.**

Staff Representative: Daniel Inouye

Mr. Inouye stated that the Environmental Protection Agency (EPA) establishes health-based standards for six pollutants including Ozone. He informed that the Clean Air Act requires State and Local Air Quality Management Agencies to demonstrate that they have the authority and resources to implement, maintain and enforce these air quality standards.

Mr. Inouye explained that this Ozone Infrastructure Plan is a demonstration of these requirements. If adopted, he stated that the Infrastructure Plan will be submitted through the Nevada Division of Environmental Protection (NDEP) to EPA, as a revision to the Washoe County portion of Nevada Ozone State Implementation Plan.

Vice Chair Novak opened the Public Hearing. There was no public comment.

Dr. Hess moved the District Board of Health adopt “The Washoe County Portion of the Nevada State Implementation Plan to Meet the Ozone Infrastructure SIP Requirements of Clean Air Act Section 110(a)(2)”. Mr. Brown seconded the motion which was approved four in favor and none against.

8. Regional Emergency Medical Services Authority

Presented by: JW Hodge

- A. Review and Acceptance of the REMSA Operations Report for June, 2018

Mr. Hodge stated he wished to acknowledge Mr. Kenny Kitts who was present, for his significant role in the preparation of the monthly REMSA Report, and informed that Mr. Kitts has been with REMSA for twenty-five years.

Vice Chair Novak congratulated Mr. Kitts and thanked him for his hard work.

There was no public comment.

Mr. Brown moved to accept the REMSA Operations Report for June 2018. Mr. Delgado seconded the motion which was approved four in favor and none against.

B. *Update of REMSA's Public Relations during June 2018

Mr. Hodge stated that with the very high temperatures in June and July that REMSA has reached out to the public through various media outlets to provide tips to stay healthy and safe.

Mr. Hodge informed that new technology had been installed earlier in July to allow REMSA's website to be translated into one hundred different languages.

Mr. Hodge stated that a new pop-up feature on the career section of REMSA's website allows applicants to complete a short form to contact Human Resources and apply for jobs. He informed that this new feature was implemented in response to Mr. Dahir's question regarding REMSA's methods of recruiting.

During the week of July 30th, Mr. Hodge informed that the new internal employee survey would be launched. He stated that it would be open for two weeks and REMSA would then inform employees of the results and next steps forward.

9. Consideration and possible adoption of a policy for Environmental Health Services (EHS) and Air Quality Management fee relief or mitigation for entities affected by disasters and emergencies. – (Item was tabled for further discussion)

Staff Representative: Kevin Dick

Mr. Dick explained that he had produced this staff report as a follow up to action taken following the flooding in Lemmon Valley in which the decision was made to not collect fees for some of the properties impacted by the flood. He stated that he had been requested at that time to bring back a policy for the Board to consider regarding how the Health District should manage any fee relief or mitigation in the event of disasters or emergencies.

Mr. Dick summarized his proposed policy, in which the Health District would not provide any relief or mitigation for fees unless the jurisdiction in which the property or business was located agreed to reimburse the Health District, or, in the event a third party was willing to reimburse the Health District for the fee.

Mr. Dick informed that part of the consideration in this policy was that, while the Lemmon Valley flooding was certainly a disaster and hardship for those residents, it was fairly restricted as to the location and extent of the damage. He stated that future events could involve an entire region which would exceed the Health District's capability to effectively mitigate fees.

Mr. Dick informed that the Health District is currently receiving funding support through a Washoe County General Fund transfer, and depending on where the properties were actually impacted, opined that this scope of mitigation would be above and beyond the Health District's responsibilities.

Dr. Hess inquired the cost of the fees in question, and opined that the larger fees could place an additional hardship on a home or business owner. Mr. Dick informed that the fees range from several hundred to several thousand dollars.

Mr. Delgado agreed with Dr. Hess, and stated that persons without proper insurance to pay for repairs and fees could be burdened to the point of losing their home. He opined the policy to possibly be too strict.

Vice Chair Novak referred to Mr. Dick's comment that a large portion of the Health District budget is received from Washoe County, and inquired if possibly a policy should be considered between Washoe County and the Health District for mitigation of fees.

Vice Chair Novak stated that he agrees in many ways with the policy as it is written due

to potential consequences for a wide spread emergency or disaster. He informed that he would like to table this item for further discussion of a policy with the jurisdictions and investigation of a mechanism or process for appeals but expressed his concerns regarding the Board's capacity to address a large number of individuals seeking to appeal the District's charges for services. He inquired if Mr. Dick was agreeable to this action.

Mr. Dick stated that he was agreeable, and that he was open to suggestions from the Board Members.

Vice Chair Novak moved to table this item for Consideration and possible adoption of a policy for Environmental Health Services (EHS) and Air Quality Management fee relief or mitigation for entities affected by disasters and emergencies for further investigation. Dr. Hess seconded the motion which was approved four in favor and none against.

Vice Chair Novak inquired of Ms. Admirand, since this item had been tabled, if the Board is required to hear public comment. Ms. Admirand informed that when a motion is made it is an action item, and instructed Vice Chair Novak to ask the Clerk if there is any public comment at this time.

As there was no one wishing to speak, Vice Chair Novak closed the public comment period.

10. *Staff Reports and Program Updates

A. Air Quality Management, Charlene Albee, Director

Program Update, Divisional Update, Program Reports

Mr. Inouye stated that the Board approved Air Quality Management's commitment to the Wildland Fire Air Quality Response Program at the March DBOH Meeting. He informed that Ms. Julie Hunter has been trained as an Air Resource Advisor (ARA) and that she had been deployed to wildfires in New Mexico and Colorado.

Ms. Hunter introduced herself as a Senior Air Quality Specialist with the Washoe County Health District Air Quality Management Division.

Ms. Hunter stated that she had been deployed to the Ute Fire in New Mexico and the 416 Fire in Colorado. She explained that an ARA is a part of the Wildland Fire Air Quality Response Program led by the USDA Department of Forest Service, and that the Program was developed to assess, communicate and address smoke risks from massive fire incidents.

Ms. Hunter detailed the components to this Program and explained her duties as an ARA were to use the air quality monitoring and modeling equipment to analyze and predict smoke impacts and to communicate the impacts to Incident Command, local agencies and the public.

Ms. Hunter explained the monitoring equipment they deploy measures the fine particulate matter that is the major component of wildfire smoke. The equipment uses satellite service to populate air quality index data on maps as shown in her presentation, noting that these maps are available to the public.

Ms. Hunter informed that ARAs are part of Incident Command and work in the Planning Section in collaboration with the Incident Meteorologist, Fire Behavior Analyst and others. These groups work together, examining each group's models to better determine smoke impacts, incorporating Ground and Air Operations reports

Ms. Hunter explained that with the Modeling and Monitoring instruments, the ARAs provide the previous air quality index as well as the forecasted air quality index for the

impacted communities. She spoke of the Outlook software displayed in her presentation and explained that it is specific to the ARA Program, that it is updated daily and populated with air quality monitoring data, and that health warnings and safety information are also displayed.

Ms. Hunter detailed the avenues of communication for the data they collect, and informed that the success of an ARA depends on the coordination and cooperation of the whole Incident Command Team working with the Emergency Operations Center in the local communities to providing consistent messaging.

Ms. Hunter stated the benefits she bring back to the Division as an ARA include her working knowledge of the Incident Command System and experience with the modeling and monitoring tools that are being used for local impacts. She informed that AQM is looking into the Outlook products and has tried to incorporate some of that messaging into their messaging. Ms. Hunter stated that consistent messaging is important throughout the nation on managing smoke impacts and that her experience supports and supplements planning for Exceptional Event Demonstrations, Mitigation Plans and AQM's Smoke Management Program.

Ms. Hunter informed that she would like to thank for the record Truckee Meadows Fire District, thanking Chief Moore who was present for sponsoring her as well as Captain Bunn, also present, who went out of their way to help her. She thanked the Air Quality Management Division and Ms. Albee and Mr. Inouye specifically for their support, as well as the District Board of Health for approving and supporting her role as an Air Resource Advisor.

Dr. Hess inquired what the air quality forecast for the next ten days would be. Ms. Hunter informed that smoke impacts would be great, especially with the Carr Fire which increased from 4,500 to 20,000 acres overnight. She informed that, with the fires in northwest California and southwest Oregon, there will be significant smoke in the area for the foreseeable future and that they have been consistently messaging to stay indoors, run the air conditioner and to avoid exercise or exertion outdoors.

Mr. Brown stated that air quality control is a consistent effort and is not limited to the fire season. He informed that Ms. Hunter is one of the leaders that have been working with land managers for the past several years and spoke of plans for more prescribed fires to reduce fuel loads in the desert and forest.

Mr. Brown expressed he is very happy that Ms. Hunter does such a fine job in her role to the benefit of the community overall, and thanked her for the work she does.

B. Community and Clinical Health Services, Steve Kutz, Director

Divisional Update – Changes to CCHS Programs; Medicaid Enrollment Assistance; Data & Metrics; Program Reports

Mr. Kutz commented that, in regards to the changes in the CCHS Programs, they have been doing what they can with the limited resources available to them and that this has been a difficult change to make in relation to the Maternal Child Health Program. He stated that, while CCHS knows this program to be important, the changes were made to best serve the community and do what is best for the Division as a whole.

As part of the Plan, Do, Check, Act process, Mr. Kutz informed that the changes CCHS is making will be evaluated, assessing impact to staff, programs and the community.

Mr. Kutz stated that CCHS had their second outing to the Detention Facility at the Washoe County Sheriff's Office and served approximately ten women at this visit, providing Long Acting Reversible Contraceptives. He informed that the partnership is

going very well between CCHS and the Sheriff's Office and that the women are appreciative and excited for this opportunity.

C. Environmental Health Services, Chad Westom, Director

Environmental Health Services (EHS) Division and Program Updates – Community Development, Food, Special Events, Land Development, Safe Drinking Water, Vector-Borne Diseases, Waste Management, Inspections

Mr. Westom informed that the EHS Team has been very successful in streamlining the Health plan review processes and the turn-around time is reduced to a week or less; the average completion time for the various plans are now posted on Health District website.

Mr. Westom stated that Chair Jung requested EHS approach the Washoe County Board of County Commissioners regarding \$180,000 in additional funding for mosquito abatement after the June DBOH Meeting where he reported on a proposed mosquito abatement program. He informed that Mr. Dick had more information for the Board.

As far as requesting additional funds for mosquito abatement, Mr. Dick wished to inform the Board that the Health District is pleased to have ended FY18 with a higher than anticipated fund balance as shown in the financial report from June 2018. He explained that, because of this ending fund balance, his intention is to support the mosquito abatement needs with Health District funds versus going to the Board of County Commissioners for an additional fund transfer at this point.

Along with this expenditure for mosquito abatement, Mr. Dick informed that the Health District will be identifying and proposing to the Board during the November Strategic Planning meeting other one-time investments in the District and for the community's benefit to be funded by a portion of the ending balance.

D. Epidemiology and Public Health Preparedness, Dr. Randall Todd, Director

Program Updates for Communicable Disease, Public Health Preparedness, and Emergency Medical Services

Ms. Conti informed that she had no additional comments but would be happy to answer any questions in Dr. Todd's absence.

E. Office of the District Health Officer, Kevin Dick, District Health Officer

District Health Officer Report – REMSA Franchise Agreement, Plan Reviews, Washoe Behavioral Health Policy Board, Public Health Accreditation, Community Health Improvement Plan, Truckee Meadows Healthy Communities, Quality Improvement, Workforce Development, Style Guide, New CCHS Fees, Other Events and Activities and Health District Media Contacts.

Mr. Dick thanked the Board Members who participated in the meeting with City of Reno for funding of additional staffing through the Enterprise Fund and specifically thanked Mr. Delgado for his help in organizing the meeting as well as Vice Chair Novak and Mr. Brown's efforts to continue to work toward this arrangement.

Mr. Dick informed that the Health District continues to work with NDEP and TMWA on the interlocal agreement for alternative oversight of plan review. He opined they are nearing an agreement.

Mr. Dick announced that there will be an unveiling event to present the new Community Health Improvement Plan (CHIP) to the community held at the County Chambers on August 2nd from 9:30-11:30 a.m. He informed that Carson City Health and Human Services CHIP was approved by their Board on July 19 and will join the Washoe

County Health District at this event, and opined there may be opportunities for collaboration between the two. He stated that a number of community partners will be presenting at the event, as well.

Mr. Dick informed that a Family Health Festival (FHF) had been held at the Miguel Ribero Park with the Truckee Meadows Healthy Communities (TMHC) and that a number of partners participated including Community Health Alliance. The Festival was quite successful with approximately five hundred persons served. Services available were immunizations, BMI assessment, blood pressure and skin cancer screening, Healthy Smiles and distribution of back-to-school materials and information. He informed that there is another FHF being planned for October or November.

Vice Chair Novak requested an update on Accreditation. Mr. Dick obliged by informing that the Health District is on track to submit all documents for review on October 1st. He stated that over 200 of the required 213 documents have been collected and are under review; the balance is pending finalization of data to complete them. He explained that there will be a site visit within six months after the October 1st document submission to PHAB.

Mr. Dick informed that he had the opportunity to see Carol Moehrle who had been part of the Health District's Fundamental Review Team in 2013-14 at the NACCHO Conference that he and Ms. Peters attended in July. He stated it was enjoyable to speak with her about the progress the Health District has made and how useful the Fundamental Review had been in the process.

Vice Chair Novak requested to have an update on the Health District's status for Accreditation for his report at the upcoming NALBOH Board Meeting and Annual Conference in early August. Mr. Dick stated he would be provided with a hard copy of this information to take with him and requested Ms. Rogers to set a date to meet with Ms. Peters, Vice Chair Novak and himself prior to the NALBOH events.

11. *Board Comment

Dr. Hess inquired if there was any other information available on the ambulance transport agreement between City of Reno Fire Department and MedXAirOne, LLC that had been pulled from the July 18th Reno City Council Agenda. Dr. Hess expressed concern that this item could be brought back on a future agenda.

Mr. Brown suggested that this item could be agendaized for review on the September DBOH Meeting for concerned parties to be able to discuss with and educate the Board on their stances.

Vice Chair Novak closed the Board comment period.

12. *Public Comment

Ms. Brandhorst expressed concerns for living conditions in low income housing.

Vice Chair Novak closed the public comment period.

13. Adjournment

Vice Chair Novak adjourned the meeting at 1:52 p.m.

Possible Changes to Agenda Order and Timing: Items on the agenda may be taken out of order, combined with other items, withdrawn from the agenda, moved to the agenda of another later meeting; moved to or from the Consent section, or they may be voted on in a block. Items with a specific time designation will not be heard prior to the stated time, but may be heard later. Items listed in the Consent section of the agenda are voted on as a block and will not be read or considered separately unless withdrawn from the Consent agenda.

Special Accommodations: The District Board of Health Meetings are accessible to the disabled. Disabled members of the public who require special accommodations or assistance at the meeting are requested to notify Administrative Health Services in writing at the Washoe County Health District, PO Box 1130, Reno, NV 89520-0027, or by calling 775.328.2416, 24 hours prior to the meeting.

Public Comment: During the “Public Comment” items, anyone may speak pertaining to any matter either on or off the agenda, to include items to be heard on consent. For the remainder of the agenda, public comment will only be heard during items that are not marked with an asterisk (*). Any public comment for hearing items will be heard before action is taken on the item and must be about the specific item being considered by the Board. In order to speak during any public comment, each speaker must fill out a “Request to Speak” form and/or submit comments for the record to the Recording Secretary. Public comment and presentations for individual agenda items are limited as follows: fifteen minutes each for staff and applicant presentations, five minutes for a speaker representing a group, and three minutes for individual speakers unless extended by questions from the Board or by action of the Chair.

Response to Public Comment: The Board of Health can deliberate or take action only if a matter has been listed on an agenda properly posted prior to the meeting. During the public comment period, speakers may address matters listed or not listed on the published agenda. The *Open Meeting Law* does not expressly prohibit responses to public comments by the Board of Health. However, responses from the Board members to unlisted public comment topics could become deliberation on a matter without notice to the public. On the advice of legal counsel and to ensure the public has notice of all matters the Board of Health will consider, Board members may choose not to respond to public comments, except to correct factual inaccuracies, ask for Health District Staff action or to ask that a matter be listed on a future agenda. The Board of Health may do this either during the public comment item or during the following item: “Board Comments – Limited to Announcement or Issues for future Agendas.”

Posting of Agenda; Location of Website:

Pursuant to NRS 241.020, Notice of this meeting was posted at the following locations:

Washoe County Health District, 1001 E. 9th St., Reno, NV
Reno City Hall, 1 E. 1st St., Reno, NV
Sparks City Hall, 431 Prater Way, Sparks, NV
Washoe County Administration Building, 1001 E. 9th St, Reno, NV
Downtown Reno Library, 301 S. Center St., Reno, NV
Washoe County Health District Website www.washoecounty.us/health
State of Nevada Website: <https://notice.nv.gov>

How to Get Copies of Agenda and Support Materials: Supporting materials are available to the public at the Washoe County Health District located at 1001 E. 9th Street, in Reno, Nevada. Ms. Laura Rogers, Administrative Secretary to the District Board of Health is the person designated by the Washoe County District Board of Health to respond to requests for supporting materials. Ms. Rogers is located at the Washoe County Health District and may be reached by telephone at (775) 328-2415 or by email at lrogers@washoecounty.us. Supporting materials are also available at the Washoe County Health District Website www.washoecounty.us/health pursuant to the requirements of NRS 241.020.

WASHOE COUNTY DISTRICT BOARD OF HEALTH

CERTIFICATE OF ADOPTION

WHEREAS, a need has arisen to prepare “The Washoe County Portion of the Nevada State Implementation Plan to Meet the Ozone Infrastructure SIP Requirements of Clean Air Act Section 110(a)(2)”, and;

WHEREAS, this matter has been duly noticed and heard in conformance with applicable administrative procedure requirements;

NOW, THEREFORE, BE IT RESOLVED, that this Board hereby adopts “The Washoe County Portion of the Nevada State Implementation Plan to Meet the Ozone Infrastructure SIP Requirements of Clean Air Act Section 110(a)(2)”.

“The Washoe County Portion of the Nevada State Implementation Plan to Meet the Ozone Infrastructure SIP Requirements of Clean Air Act Section 110(a)(2)” was duly and regularly introduced, passed, and adopted at a regular meeting of the Washoe County District Board of Health, on the motion of Hess, seconded by Brown, on the 26th day of July, 2018, by the following vote of the Board:

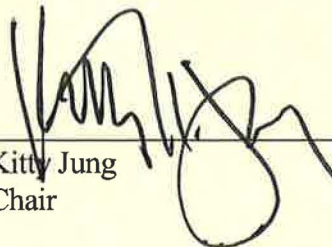
AYES: Brown, Delgado, Hess, Novak

NAYS: None

ABSENT: Dahir, Jung, Young



Kevin Dick
District Health Officer



Kitty Jung
Chair